

# **DRUG OPERATIONS MANUAL**

## **SECTION 55**

### **DEA COMPLIANCE**

CONFIDENTIAL

MCKMDL00651873

**MC-WV-00451.00001**

**MC-WV-00451**

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To  
DistributionDate  
January 15, 1997From  
Dan WhiteLocation/Tel  
One Post Street, 28th Fl.  
(415) 983-8598**McKesson**  
Intra Company  
CorrespondenceSubject  
Drug Operations Manual  
Section 55—DEA ComplianceCopies To  
M. Majeske/36 (w/o Sec. 55)  
M. Pulido/36 (w/o Sec. 55)REMOVESection 55, all  
Exhibits, allINSERTTable of Contents, Section  
55, pp. 1-133, Index, Exhibits  
Log, and Exhibits 55-1  
through 55-52

Attached is the complete Section 55 of the Drug Company Operations Manual, DEA Compliance, Revision #107. It contains extensive changes to provide guidance and clarification to ensure compliance with current DEA regulations and McKesson's internal procedures.

There are two copies for each Distribution Center: one is for immediate placement in your DC's Drug Operations Manual, replacing Section 55 in its entirety; the second is to be forwarded promptly to appropriate personnel within your DC.

New DC Partners (former FoxMeyer locations) should read and insert a copy into their DCOG as a supplement to its current documentation relating to DEA compliance, giving particular attention to DEA-specific compliance activities that affect DC compliance procedures.

Each DC Manager or designee must read, implement any process changes, complete the training of DC personnel (including completion of a DEA Continuing Education Report, Exhibit 55-33), and respond to his or her VPDO when these steps are completed, but no later than March 3, 1997.

If you have questions about this revision or other DEA compliance matters, please contact Gary Hilliard, (972) 446-4614, or Rolly Blythe, (803) 796-7965.



Dan White  
Vice President, Regulatory Affairs  
Attachments

DC ROUTING LIST		
	Initials	Date
DCM/VP Sales		
OM		
DCIM		
DCAM		
CRS		
WHS. SPVR.		

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**DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 TABLE OF CONTENTS.i****INTRODUCTION****55-1**

Responsibility of Company Officials

55-1

DEA Section 880 Authority

55-1

The Actual Inspection

55-1

Physical Inventory

55-2

Records Retention

55-2

Areas of Frequent Concentration

55-2

**I. FEDERAL REGULATORY REQUIREMENTS****55-7**

A. General

55-7

B. Administrative Inspection by DEA

55-8

C. Automated Reports and Consolidated Order System (ARCOS)

55-9

**II. REGISTRATION AND RE-REGISTRATION****55-12**

A. Initial Registration

55-12

B. Renewal

55-14

C. Move of an Existing Distribution Center to New Location

55-15

D. DEA Field Division Office Addresses

55-16

**III. SECURITY REQUIREMENTS—1301.71****55-18**

A. Summary of DEA Requirements

55-18

B. Physical Security

55-18

C. McKesson Internal Controls

55-23

**DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 TABLE OF CONTENTS.ii**

D. Verification of Customer Registration—1301.74	55-31
E. Explanation of Expiration Dates for DEA Registration Numbers	55-
F. Invalid or Expired Certificate—Action Required	55-35
G. DEA Continuing Education Documentation	55-36
<b>IV. SUSPICIOUS ORDERS</b>	<b>55-38</b>
A. Detecting Suspicious Orders—1301.74	55-38
B. Reporting Suspicious Orders	55-40
<b>V. INVENTORIES</b>	<b>55-46</b>
A. Definitions and General Instructions—1304.11	55-46
B. Inventory Listing Procedures	55-48
C. Post Inventory Procedures	55-52
<b>VI. REGISTRANT RECORDS</b>	<b>55-55</b>
A. Registry (DEA) Numbers on Transfer Documents	55-55
B. Recordkeeping	55-55
C. Purchase Order Records	55-60
D. Receiving Records—Receipts from Vendors	55-61
E. Return Credits—Controlled Substance Receipts from Customers	55-64
F. Sales and Distribution Transactions	55-68
<b>VII. ORDER FORM REGULATIONS—DEA FORM 222</b>	<b>55-80</b>
A. Scope of Part 1305—1305.01	55-80

**DRUG OPERATIONS MANUAL55-CONTROLLED SUBSTANCES 1/97 TABLE OF CONTENTS.ii**

B. Order Filling Processing	55-85
C. Power of Attorney—1305.07	55-94
D. Lost and Stolen Order Forms—1305.12	55-96
E. Preservation of Order Forms—1305.13	55-98
F. Return of Unused Order Forms—1305.14	55-99
G. Cancellation and Voiding of Order Forms—1305.15	55-99

**VIII. COMPUTER ROOM TRANSACTIONS 55-102**

A. Transport Transactions to Computer Room	55-102
B. Weekly/Daily Key-entry	55-102
C. Producing Month-End ARCOS Report	55-105
D. DEA Error Reports	55-108
E. File Set-Up for ARCOS Edit Program	55-112
F. Central Reporting Identifier Number	55-114

**IX. MISCELLANEOUS TOPICS 55-116**

A. Disposal of Controlled Substances	55-116
B. Breakage Reports	55-117
C. Losses	55-117
D. Selection of Carriers—1301.74(e)	55-118
E. Discontinuance or Transfer of Business—1307.14	55-119
F. U.S. Postal Mailing Limitations	55-121

**DRUG OPERATIONS MANUAL55-CONTROLLED SUBSTANCES 1/97 TABLE OF CONTENTS.iv**

G. NDC Number Change	55-121
H. Handling Schedule II Controlled Substance Sales to Doctors When Billing Hospital or Retail Account	55-1
<b>X. DEA AUDITS</b>	<b>55-125</b>
A. By DEA Personnel	55-125
B. Distribution Center-Quarterly DEA Checklist	55-127
<b>XI. CHEMICAL DIVERSION AND TRAFFICKING ACT OF 1988</b>	<b>55-130</b>
A. Listed Chemicals	55-130
B. Recordkeeping Requirements	55-131
C. Retention Records	55-131
D. Reporting Requirements	55-132
E. Importation/Exportation of Listed Chemicals	55-132
F. Penalties	55-132

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-1:INTRO.1

INTRODUCTIONResponsibility of Company Officials

At each Distribution Center, it is the responsibility of the Distribution Center Manager (DCM) to ensure that company procedures for DEA inspections are followed. It also is the Distribution Center Manager's responsibility to provide training to all other exempt managers on procedures to follow should a DEA inspection occur in his or her absence.

The Distribution Center Manager, any other exempt manager, or non-exempt employee trained in regulatory compliance, must accompany DEA investigators during an inspection. Investigators must never be left alone in the Distribution Center.

DEA Section 880 Authority

DEA investigators are authorized to enter controlled premises to conduct administrative inspections for the purpose of

1. Inspecting, copying and verifying the correctness of records, reports or other documents required to be kept by the statute and DEA regulations;
2. Inspecting within reasonable limits and in a reasonable manner the controlled premises and all pertinent equipment;
3. Inventorying all controlled substances on hand;
4. Obtaining samples of all controlled substances (as long as a DEA Form 84, "Receipt for Samples," is presented and payment received; and
5. Inspecting "all other things therein (including records, files, papers, processes, controls, and facilities)" appropriate for verifying the records and reports required to be kept or otherwise relating to the provisions of the Controlled Substances Act.

DEA investigators, however, are not authorized to view, copy or verify financial data, sales data (other than shipping data) or pricing data. No such information should be made available without authorization from your Regional Office and the Law department in San Francisco to allow deviations from this manual.

The Actual Inspection

A DEA inspection of a drug wholesale facility will generally include three primary procedures—a physical inventory of selected controlled substances, a review of records relating to the receipt and sale of those substances,

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-2:INTRO.2

and a thorough review of your security and procedures. Following those procedures the investigator will attempt to reconcile the physical inventory, in a given period of time, with what the receipt and sale records show should be on hand.

One matter deserves mention at this point: wholesalers tend to think in terms of bottles of products, and if there is an underage of one or two bottles, they tend not to be overly concerned. DEA, however, enforces on the basis of "dosage units," and to the DEA an unexplained loss of one bottle equates to as many dosage units as were contained in the bottle. Therefore, while the escort is with the investigator, he or she should attempt to learn and commit to writing everything that the investigator found that might conceivably implicate the firm's recordkeeping practices, even if only one bottle of 100 tablets is unaccounted for.

#### Physical Inventory

The inventory is generally straightforward, since it involves little more than physically counting the units on hand of a given substance. Nevertheless, the investigator should be watched by the escort and the investigator's count should be double checked. Mistakes have been known to occur, and it is always best to resolve any miscounts at the time rather than at a subsequent hearing or court enforcement action.

#### Records Retention

The most common mistake by companies is to hand an investigator receipt and sale records on one or more substances, give him an area in which to work, tell him to ask if he has any questions and then leave him alone to do his job. Unfortunately, many investigators may not be familiar with our company's recordkeeping system, or may make erroneous assumptions of our practice because no one is readily available to answer questions. Thus, the escort should be with an investigator to explain the system, answer questions and, essentially, educate the investigator, who occasionally does not know what to ask for.

#### Areas of Frequent Concentration

##### 1. In-depth audit

During a general inspection, DEA almost always conducts an in-depth audit of controlled substance activity, focusing on controlled substance receipts, shipments, stock transfers, and returns to the Distribution Center. In auditing the Distribution Center, DEA will start with an inventory of a substance on a specific date, and will add to this inventory the amount of that substance received after that date. This total amount should equal the physical inventory taken by

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-3:INTRO.3

the investigators plus or minus the Distribution Center's sales, credits and returns over the specific time period.

During an inspection, DEA investigators normally will audit three or four substances.

2. Excessive purchases

DEA will focus on what procedure the Distribution Center follows to determine whether a particular customer is excessively purchasing controlled substances, indicating a potential abuse or diversion.

3. The use of incorrect customer DEA registration numbers and information

Typically, DEA will audit the numbers and registration information concerning 20 or more customers of a particular Distribution Center to determine whether the Distribution Center has the customers' DEA registration numbers, whether the controlled substances are being shipped to the same address at which the customers are registered, whether the Distribution Center is shipping controlled substances in certain schedules that customers are not authorized to receive, etc. In addition, DEA investigators will specifically ask how the Distribution Center continually monitors its customers' registration information to ensure that the registrations are valid, the numbers correct, and that customers are entitled to receive the scheduled substances ordered.

4. Biennial inventory

DEA investigators will often check to see whether the Distribution Center has complied with the regulation by taking and maintaining a biennial inventory.

5. Security-General

Often, a DEA investigator will begin an inspection before entering the facility's premises by noting the outside appearance of the building. Items that would concern an investigator include posted signs that identify the facility as a drug warehouse, the adequacy of the lighting around the building, the number of doors providing access to the warehouse, and whether there is any access to the roof from the outside.

6. Security-Warehouse

During a general inspection, DEA investigators normally will check the Distribution Center's security. This inspection could include a check of the emergency exit alarm system, and an examination of ceiling

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-4:INTRO.4

vents to determine whether they are fully protected and connected to the alarm system.

7. Security-Cage and Vault

In inspecting the areas where controlled substances are stored, the DEA investigator will check to see if the following are in order:

- A. All cage doors and the day gate should be self-closing and self locking;
- B. The cage and vault should have a current verified list of personnel authorized to have access to the storage area;
- C. Any damaged or outdated controlled substances in their respective cage or vault areas;
- D. Nothing other than Schedule III-V items and appropriate records, with written permission, should be kept in the cage, and nothing other than Schedule II items and records should be retained in the vault;
- E. The construction of the cage and vault should fully meet the requirements of 21 CFR 1301.72; and
- F. The electronic alarm systems in the cage and vault should be separate, and both systems should be in good working order.

Anything that can be repaired during the audit should be, or steps taken to repair it.

NOTE: EVEN IF THINGS ARE IN WORKING ORDER, DEA ALSO WILL NOTICE WHETHER PROCEDURES ARE BEING FOLLOWED, e.g., IS THE VAULT OR CAGE DOOR SHUT?

8. Segregation of records

Records for Schedule II controlled substances must be kept separate and readily retrievable from other records retained by the Distribution Center. DEA investigators will often check to see if this requirement is being met.

9. Proper execution and endorsement of customer orders

Typically, DEA investigators will review a number of DEA Forms 222 to determine whether the Distribution Center filled orders that were not properly executed and signed by the customer, or were filled with alterations.

10. Proper registration

DEA investigators will often inspect the Distribution Center's DEA registration certificate. The DEA investigators will also inspect the certificate to determine whether the registrant is licensed to ship the applicable controlled substances being distributed.

11. Verification of telephone and pick-up ("will call") orders

During an inspection, DEA will often concentrate on how a Distribution Center verifies information when an order is phoned in and later picked up. DEA is of course concerned that a person may somehow obtain a registrant's DEA number, phone in an order, and then obtain the controlled substances at the distribution facility.

12. Proper inventorying of controlled substances when initially scheduled

By law, any registrant holding in inventory a substance that is newly controlled must inventory the substance upon the effective date of the classification regulation. DEA will often check a registrant to determine whether this inventory was taken on the effective date of the rule scheduling the substance.

The following areas of your Distribution Center and its operations will be questioned:

1. Employee identification;
2. Employee hiring (screening and checking);
3. Practices and procedures;
4. Building security;
5. Cage and Vault security;
6. Records;
7. Inventory procedures;
8. Sales information; and
9. Miscellaneous information about the company.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-6:INTRO.6

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I. FEDERAL REGULATORY REQUIREMENTSA. General

The aim of the Controlled Substances Act is to prevent diversion of abusable substances into illicit traffic while ensuring their availability for legitimate medical purposes. The Drug Enforcement Administration strictly interprets the law and regulations and has imposed significant fines for technical errors in completing forms and keeping records. It is extremely important that McKesson employees comply fully with the regulations and the following guidelines.

The Controlled Substances Act and the implementing regulations (21 CFR 1300 to the end) mandate that all distributors, as a part of the national controlled substance chain of control, comply with the registration, security, and recordkeeping requirements pertaining to all controlled substance transactions, as set forth in this section.

The information contained, and the numbered references in the 1300 series, refer to Chapter II of the Code of Federal Regulations Title 21, Drug Enforcement Administration, Department of Justice.

All Distribution Centers must have the following DEA publications in a permanent file available for ready reference. The instructions must be followed as written. Comments in this section of the Operations Manual are an attempt to supplement these instructions in a practical manner. Employees should address specific questions on their implementation to Drug Operations Support, 28th floor, San Francisco.

1. Code of Federal Regulations 21, Food and Drugs, Part 1300 to end, available from:

Superintendent of Documents  
U.S. Government Printing Office  
POB 371954  
Pittsburgh PA 12050-7954  
(202) 512-1557  
(Cost should be in the \$13.00 range—do not buy a subscription.)

2. ARCOS General Reporting Information Manual, available from:

United States Department of Justice  
Drug Enforcement Administration

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-8:SEC.I.2

ARCOS Unit, POB 28293  
Central Station, Washington DC 20005  
(202) 307-8600.

B. Administrative Inspection by DEA

1. Authority to Make Inspection-1316.03

DEA Investigators or agents of the Drug Enforcement Administration are authorized to enter controlled premises and conduct administrative inspections for the purpose of:

- a. Inspecting, copying, and verifying the correctness of records, reports, or other documents required to be kept or made under the Act and the regulations promulgated under the Act, including, but not limited to:
  - (1) Inventory and other records-Part 1304;
  - (2) Order form records-Part 1305;
  - (3) Distribution records-Part 1306; and
  - (4) Shipping records, name of carrier used, and date and quantity of each shipment, Part 1306;
- b. Making a physical inventory of all controlled substances on hand at the premises;
- c. Collecting samples of controlled substances (Receipt to be given on DEA Form 84);
- d. Checking records and information on distribution of controlled substances; and
- e. All other files, documents, etc., pertinent to the verification of records, reports, etc., bearing on the provisions of the Act and its regulations.

2. Exclusions from Inspection-1316.04

No inspection authorized by these regulations extends to:

- a. Financial data;
- b. Sales data other than shipping data; and
- c. Pricing data.

3. Entry and Consent to Inspect-1316.05 through 1316.08

Any inspector shall have the right to enter premises containing controlled substances and conduct inspections at reasonable times and in a reasonable manner provided that:

- a. The purpose of the inspection is stated;
- b. Appropriate credentials are presented;
- c. Written notice of inspection authority (DEA Form 82) is presented; and
- d. An informed consent is given or an administrative warrant is issued.

NOTE: WHILE INSPECTION RIGHTS OF THE DEA ARE CLEARLY STATED IN THE ACT, ALL SUCH INSPECTIONS ARE TO BE REPORTED BY MCKESSON MANAGEMENT TO THE SAN FRANCISCO LAW DEPARTMENT AT ONCE. IF THERE IS ANY DEVIATION FROM NORMAL PROCEDURES, TELEPHONE INA TRUGMAN AT (415) 983-8325. STANDARD PROCEDURES FOR REPORTING GOVERNMENT INSPECTIONS ARE DETAILED BEGINNING AT PAGE 50-125 OF THIS MANUAL.

4. Frequency of Administrative Inspections-1316.13

Except where circumstances otherwise dictate, it is the intent of the DEA to inspect all distributors of controlled substances in Schedules II-V once every three years.

C. Automated Reports and Consolidated Order System (ARCOS)

1. General Description

ARCOS is an automated system developed by the DEA to provide for the audit of (controlled substance) inventory transactions originated by manufacturers, distributors, importers, and exporters.

The reportable transactions of distribution consist of sales and purchases as well as other activities that will add to inventory (e.g., returned goods) or subtract from inventory (theft, destruction, etc.).

ARCOS provides government capability to maintain a current record of selected controlled substances from point of import or manufacture to point of sale, distribution, export, or other disposition to the dispensing (consumption) level.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-10:SEC.I.4

A subpart of the ARCOS system provides the federal government with an automated review and summarization (audit) of filled order forms (DEA Form 222).

2. Products Covered Under ARCOS

The following products must be reported under ARCOS:

- a. All Schedule II controlled substances. These are stored in the vault, and are coded 'X' on McKesson invoices. They are printed on separate picking documents under Economost Pick Department JE.
- b. All Schedule III ARCOS reportable controlled substances. These are stored separately in the DEA cage and are coded 'B' on McKesson invoices. They are printed on separate picking documents under Economost Pick Department JB.
- c. An on-request job (DF68) is available on the AS400 to print a listing of controlled substances coded on the inventory file. This is available to Distribution Center Managers when needed.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-11:SEC.I.5

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## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-12:SEC.II.1

II. REGISTRATION AND RE-REGISTRATIONA. Initial Registration1. Fee Amounts-1301.11, 1301.12

For each registrant to distribute controlled substances, the registrant shall pay a fee of \$438.00. Registration fees shall be paid at the time the application for registration is submitted for filing. Payment should be made in the form of a certified or cashier's check or money order made payable to, "Drug Enforcement Administration."

2. Form Requirements for Application-1301.31

New Distribution Centers must file initial applications for registration on DEA Form 225 (revised August 1996). No controlled substances may be purchased for new locations, nor may any other transactions take place until the Certificate of Registration DEA Form 223 has been received.

This certificate will assign the Distribution Center a DEA registration number. The certificate will not be issued, however, until DEA agents have inspected and approved the security protection to be given controlled substances in the new location. DEA also will request documentation of appropriate state licenses prior to issuing certificate.

The certificate is to be posted in the vault or cage for controlled substances. Before posting, photocopies should be made and placed in the current DEA file, to be made available to those product suppliers who will request verification of registration before making shipments of controlled substances. Also forward a copy to the National Buying Center for its records.

3. Source of Supply for Forms

DEA Form 225 (new), is illustrated in Exhibit 55-1 with instructions to complete the entries beginning below. This form may be obtained from the Registration Unit, Drug Enforcement Administration, Department of Justice, POB 28083, Central Station, Washington DC 20005, or from the Field Division Office serving the new location. The telephone number of the Registration Unit in Washington is: (202) 307-7255 or (800) 882-9539.

4. Entries on DEA Form 225 (New)

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-13:SEC.II.2

Enter Name and Address:

McKesson Drug Company  
Street Address (do not use P.O. Box)  
City, State, and Zip Code.

Line items:

1. Check box F.
2. Check schedules II, III (narcotic), IIIN (non-narcotic), IV, V.
3. Leave blank.
4. Check this box.
5. Enter appropriate DEA numbers if this condition exists.
6. Leave blank.
- 7.a. Enter your current state license or certificate numbers. Check box "Yes" but be sure you have the proper state and any necessary, current authorizations.
- 7.b. Check box "No" and add the words, "See Rider Attached."
- 7.c. Check box "No" and add the words, "See Rider Attached."
8. Leave blank.
9. Leave blank.

Signature on Form 225 (NEW) shall be that of the individual granted Power of Attorney by the Vice President Distribution Operations.

Attach a photocopy of the Power of Attorney furnished by the Vice President Distribution Operations authorizing the Distribution Center Manager to sign applications for registration.

Also, attach a check in the amount of \$438.00 for the registration fee (see preceding item II.A.1.)

Attach a rider to the initial Form 225 application as follows:

Rider to Questions 7.b., 7.c.

*Applicant is a division of McKesson Corporation. McKesson Corporation has approximately 35,000 stockholders and has no knowledge of any felony convictions in connection with controlled substances or of any surrender, revocation, suspension or denial of any CSA registration pertaining to its stockholders.*

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-14:SEC.II.3

*Applicant has surrendered certain of its CSA registrations in connection with the closing of distribution points.*

B. Renewal

1. Fee Amounts-1301.11, 1301.12

For each registrant to distribute controlled substances, the registrant shall pay a fee of \$438.00.

Payment shall be made at the time the application for re-registration is made in the form of a certified or cashier's check or money order made payable to, "Drug Enforcement Administration."

2. Form Required for Application-1301.32

Applications for renewal of the registration to distribute controlled substances shall be made on DEA Form 225a.

3. Time for Application for Re-registration-1301.31

Any registered distributor may apply to renew the registration not more than 60 days before the expiration date of his registration. The registration of McKesson Distribution Centers is required annually, and the majority of these anniversaries fall on January 31 of each year, though a few expire in other months.

4. Filing of Application-1301.34

DEA will send each Distribution Center an application for renewal-DEA Form 225a-about 60 days before its registration expires. If the forms are not received by at least 45 days before expiration date, immediately notify the

Registration Unit  
Drug Enforcement Administration  
Department of Justice  
POB 28083, Central Station  
Washington DC 20038-8083  
(202) 307-7297  
(800) 882-9539.

If there is still no response by 30 days before expiration, contact the Distribution Operations Department in San Francisco for further assistance. It is imperative that all conversations and attempts at communication be documented and such documentation maintained accordingly.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-15:SEC.II.4

5. Entries on DEA Form 225a, Renewal of Re-registration

Verify preprinted name and address on Form 225a (revised 9/89—see Exhibit 55-2, pages 1 & 2):

McKesson Drug Company  
Street Address (do not use P.O. Box)  
City, State, and Zip Code

Verify preprinted DEA registration number and the expiration of the current registration.

Line Items:

1. Check schedules II, III (Narcotic), IIIN (Non-narcotic), IV, V.
2. Enter appropriate DEA #'s if this condition exists;
- 3.a. Check box "Yes," being certain that this statement is correct, and enter your current license or certificate number.
- 3.b. Check box "No" and add the words, "See Rider Attached."
- 3.c. Check box "No" and add the words, "See Rider Attached."
4. Leave blank.
5. Leave blank.

Attach a rider to the initial Form 225 application as follows:

Rider to Questions 3.b., 3.c.

*Applicant is a division of McKesson Corporation. McKesson Corporation has approximately 35,000 stockholders and has no knowledge of any felony convictions in connection with controlled substances or of any surrender, revocation, suspension or denial of any CSA registration pertaining to its stockholders.*

*Applicant has surrendered certain of its CSA registrations in connection with the closing of distribution points.*

C. Move of an Existing Distribution Center to New Location

Operations Support will furnish the responsible Regional Security Manager a copy of the finalized functional drawing to coordinate all field activities with the DEA, local security company and local management. Blueprints and security plans must be reviewed

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-16:SEC.II.5

with the DEA Field Division Office in advance of the construction of the vault or cage.

Prior to moving a Distribution Center to a new location, the Distribution Center Manager should write to the Registration Unit at least 90 days before the move, advising them that such a move will take place and request that a corrected Certificate of Registration be issued for the new address.

At the same time, the letter should include a request that the existing registration number be retained for the new location.

The Branch Registration office will notify the DEA Field Division Office of the request. DEA's Investigators will then inspect the new premises. If the Investigators are satisfied with the physical and electronic protections to be provided for the controlled substances, they will so advise Registration and a corrected Certificate of Registration will be issued to the Distribution Center.

D. DEA Field Division Office Addresses

For listing of Drug Enforcement Administration Field Division addresses, see Exhibit 55-45.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-17:SEC.II.6

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-18:SEC.III.1

III. SECURITY REQUIREMENTS-1301.71A. Summary of DEA Requirements

ALSO REFER TO McKESSON MANAGEMENT SECURITY REQUIREMENTS IN OPERATIONS MANUAL SECTION 10.

All applicants and registrants must provide effective controls and procedures to guard against theft and diversion of controlled substances. The DEA Administrator will use the security requirements outlined in the following material of Part 1301 as standards for the physical security controls and operating procedures necessary to prevent diversion.

The following is a summary of the factors considered by DEA as the minimum necessary for strict compliance with security requirements:

1. Type of controlled substances handled;
2. Quantity of controlled substances handled;
3. Location of premises in relation to security;
4. Type of building construction;
5. Type of vault, safe, and/or secured enclosures;
6. Type of closures on vaults, safes, and or secured enclosures;
7. Adequacy of key or combination lock control;
8. Adequacy of electronic detection and alarm systems including transmittal lines and standby power;
9. The extent of unsupervised access to the building;
10. Adequacy of employee supervision for access to secured areas;
11. Procedure for handling visitors and service personnel;
12. Availability of local police protection; and
13. Adequacy of systems for monitoring receipt, distribution, and disposition of controlled substances.

B. Physical Security1. Schedule II Controlled Substances-1301.72

Vaults and safes constructed prior to September 1, 1971, and approved by the former Bureau of Narcotics and Dangerous Drugs are grandfathered under the regulations. However, where DEA deems this protection inadequate, we will, following review with DEA, install additional electronic and/or physical protection. (The preceding sentence does not constitute a waiver of our grandfather protection.)

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-19:SEC.III.2

Vaults and safes constructed after September 1, 1971, shall meet the following specifications:

a. Safe or steel cabinet:

Where small quantities of Schedule II controlled substances permit, a safe or steel cabinet may be used for storage when the following conditions are met:

- (1) The safe or steel cabinet has the following specifications or their equivalents:
  - (a) 30 man-minutes against surreptitious entry;
  - (b) 10 man-minutes against forced entry;
  - (c) 20 man-hours against lock manipulation; and
  - (d) 20 man-hours against radiological techniques.
- (2) The safe or steel cabinet, if it weighs less than 750 lbs., is bolted or cemented to the floor or wall in such a way that it cannot be readily removed.
- (3) The safe or steel cabinet, depending upon the type and quantities of controlled substances stored, equipped with an alarm system, that, upon attempted unauthorized entry, transmits a signal directly to a central protection company, or a local or state police agency that has a legal duty to respond, or a 24-hour protection as the Director may approve.

b. Vault construction after September 1, 1971:

Specifications for the construction and protection of a vault constructed after September 1, 1971, are as follows:

- (1) The walls, floors, and ceilings to be constructed of at least eight inches of reinforced concrete or other substantial masonry, reinforced vertically and horizontally with 1/2-inch steel rods tied six inches on center, or the structural equivalent of such reinforced walls, floors, and ceilings.
- (2) The door and frame unit shall conform to the following specifications or the equivalent:
  - (a) 30 man-minutes against surreptitious entry;

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-20:SEC.III.3

- (b) 10 man-minutes against forced entry;
- (c) 20 man-hours against lock manipulation; and
- (d) 20 man-hours against radiological techniques.

- (3) If operations require the vault to remain open for frequent access, it shall be equipped with a "day-gate" that is self-closing and self-locking, or the equivalent, for use during the hours of operation in which the vault door is open.
- (4) The walls or perimeter are to be equipped with an alarm, that upon unauthorized entry shall transmit a signal directly to a central station protection company, or a local or state police agency that has a legal duty to respond, or a 24-hour control station operated by the registrant, or such other protection as DEA may approve, and, if necessary, holdup buttons at strategic points of entry to the perimeter area of the vault;
- (5) The door must be equipped with contact switches and the day-gate is to be self-closing and self-locking.
- (6) The vault shall have one of the following: complete electrical lacing of the walls, floor, ceilings; sensitive ultrasonic equipment within the vault; a sensitive sound accumulator system; or such other device designed to detect illegal entry as may be approved by the Director.

c. Storage of Schedule II Controlled Substances:

All Schedule II controlled substances shall be stored in the vault. See exceptions below:

- (1) Schedule II refrigerated substances: Ronald W. Buzzeo, Former Chief of Operations-Diversion Operations, granted McKesson permission, effective May 13, 1974, to store Schedule II parenterals requiring refrigeration-Amobarbital, Secobarbital, Pentobarbital-in refrigerators located in our Schedule III controlled substance cages. McKesson Drug Company has also been granted approval to store Oxymorphone and Hydromorphone Class II suppositories in the refrigerator in the cage (Class III Security). This permission was granted to all McKesson Distribution Centers, the listing

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-21:SEC.III.4

of which is updated biennially by the Operations Support Distribution Planning Department. See copies of approving correspondence at Exhibits 55-3 and 55-3a.

2. Schedule III, IV, and V Controlled Substances-1301.72

Storage of Schedule III, IV, and V controlled substances shall be in the following secure storage areas:

- a. In a safe or steel cabinet as described for Schedule II controlled substances.
- b. In a vault as described and secured for Schedule II controlled substances.
- c. In a cage, located within a building on the premises (of the registrant) meeting the following specifications:
  - (1) Having walls constructed of not less than No. 10 gauge steel fabric mounted on steel posts, which posts are:
    - (a) At least one inch in diameter;
    - (b) Set in concrete or installed with lag bolts that are pinned or brazed; and
    - (c) Placed no more than ten feet apart with horizontal one and one-half inch reinforcements every sixty inches.
  - (2) Having a mesh construction with openings of not more than two and one-half inches across the square.
  - (3) Having a ceiling constructed of the same material, or in the alternative, a cage shall be erected that reaches and is securely attached to the structural ceiling of the building. A lighter gauge mesh may be used for the ceilings of large enclosed areas if walls are at least 14 feet in height.
  - (4) Is equipped with a door constructed of No. 10 gauge steel fabric on a metal door frame in a

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-22:SEC.III.5

metal door flange, and in all other respects conforms to all the requirements of 21 CFR 1301.72(b)(3), (2).

Cage doors must be self-closing and self-locking since constant supervision of these openings cannot be assumed.

- (5) Is equipped with an alarm system that upon unauthorized entry through any point in the enclosed controlled substance area shall transmit a signal directly to a central station protection agency or a local or state police agency, each having a legal duty to respond, or to a 24-hour control station operated by the Registrant, or to such other source of protection as the Special-Agent-In-Charge may approve.
- d. An enclosure of masonry or other material providing security comparable to a cage, as approved in writing by the Special-Agent-In-Charge.
- e. A building or enclosure within a building that has been inspected and approved by DEA or its predecessor agency, BNDD, continues to provide adequate security against the diversion of Schedule III-V controlled substances, of which fact written acknowledgment has been made by the Special-Agent-In-Charge of the DEA for the area in which such building or enclosure is situated.
- f. Such other secure storage areas as may be approved by the Special-Agent-In-Charge after considering the summary of security factors listed at page 55-18.
- g. Other specifications:
  - (1) Schedule III-V controlled substances may be stored with Schedule II controlled substances under security measures previously described for Schedule II controlled substances, provided that permission for such storage is obtained in advance in writing from the Special-Agent-In-Charge of DEA for the area in which storage is situated.
  - (2) Non-controlled substances, and other materials may be stored with Schedule III-V controlled substances in any of the secure storage areas

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-23:SEC.III.6

required by 21 CFR 1301.72(b), provided that permission for such storage of non-controlled items is obtained in advance in writing from the Special-Agent-In-Charge of DEA for the area in which storage area is situated. Any such permission tendered must be upon the Special Agent's written determination that such non-segregated storage does not diminish security effectiveness for Schedule III-V controlled substances.

C. McKesson Internal Controls

The following internal controls are established as McKesson's procedural response to the requirements established by the DEA, and listed in this section under:

- Authority to Make Inspection-Page 55-1; and
- Security Requirement Summary-Page 55-18.

SEE ALSO THE SECURITY SECTION IN OPERATIONS MANUAL SECTION 10.

1. Security Rules for Management

a. Employee Background Information Sheet:

All prospective applicants for employment will be required to complete the employee background information sheet authorizing McKesson Corporation to make a complete investigation of their background, former business relations and employment (Exhibit 55-40).

NOTE: THE INFORMATION FURNISHED OR RECOVERED AS A RESULT OF ANY INQUIRY WILL NOT NECESSARILY PRECLUDE EMPLOYMENT BUT WILL BE CONSIDERED AS PART OF AN OVERALL EVALUATION OF THE APPLICANT'S QUALIFICATIONS.

b. Personnel Entrance to Warehouse:

Wherever it is physically feasible to do so, equip the personnel entrance to the warehouse from the office or hallway with a self-closing, self-locking door that can be opened only from the warehouse side without a key or keyless entry pass-card. You may supply keys or keyless entry pass-cards to a limited number of employees who work in the area and need to leave it to go to the restroom or breakroom. You will limit the keys to

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-24:SEC.III.7

management and use a keyless entry pass-card or touch pad system on the door only for employees authorized to go into the warehouse area.

- McKesson policy prohibits the use of cameras or the taking of pictures within any Distribution Center. Such activity could compromise the security of a Distribution Center. A sign stating, "NO CAMERAS," is to be posted on each personnel door with entrance to the warehouse.

c. Visitor's Log/Consent to Search:

Use this form for all visitors and have them sign in and out (see Exhibit 55-35). Also, provide visitor's badges. In addition, visitors must be accompanied by a distribution center employee as designated by DC management when they are in the warehouse area. Ask for identification of visitors or service personnel who are unknown to McKesson personnel. Also, see item f., below.

d. Limit Office Employee Access:

Limit the access of office employees to the warehouse to those who must enter the warehouse to perform their assigned duties. Post the list of those, other than warehouse employees, authorized to enter the warehouse.

e. Vault and Cage Access:

Limit the access to the vault and cage to an absolute minimum of specifically authorized employees; post a list of these employees at the vault and cage.

During audits, the DEA has been requesting the name, address, birth date and social security numbers of these employees. Some District DEA offices are using this for background checking. If you should receive such a request you may provide the information. Section 427 of Business Practices-Employee Benefits (Protection of Employee Privacy) clearly indicates there is no restriction on complying with this DEA request. However, in the interest of positive employee relations, if this information is given to DEA, the employee(s) should be advised that it is being provided as a result of a compliance audit.

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-25:SEC.III.8

## f. Service and Repair Personnel:

If employees of equipment or building repair companies have to enter the warehouse area, they must sign the Visitor Log/Consent to Search form. They must also be under continuous random interval surveillance by supervisory employees and must be confined to the areas where they are making the necessary repairs. When it is necessary for employee maintenance personnel, non-employee maintenance personnel, business guests, or visitors to be present in or pass through controlled substance areas, adequate observation by an employee specifically authorized in writing (one of those included on the list posted at the vault and cage) must be maintained.

## g. Shipping and Receiving Clerk Responsibility:

Shipping and receiving clerks must be charged with the responsibility of making sure that outside truck drivers NEVER pass through the doors into the warehouse area without accompaniment by a supervisory employee. They must also watch their activities carefully when they are in the receiving or shipping rooms. No driver with incoming merchandise need go farther into the building than the area adjacent to the tailgate of the truck.

## h. McKesson Truck Drivers:

Our own truck drivers are not permitted to go into the warehouse area except:

- (1) If assigned, they may go into a staging area adjacent to the shipping room to move merchandise awaiting shipment; or
- (2) If drivers work part-time in the warehouse, they may enter the warehouse, but only to perform their assigned duties.

## i. Limit Employees to Own Work Areas:

Warehouse supervision must be alert to make sure that employees in the warehouse area limit their movements to the areas where they are assigned.

## j. Door Check-Locker Inspection:

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-26:SEC.III.9

Door checks and locker inspections must be performed by DC management at least once a month at random intervals and documented accordingly. Employees should be furnished locker keys and management should have duplicate keys.

k. Personal Packages-Handbags:

Packages, lunch boxes, handbags and pocketbooks must not, under any circumstances, be taken into the warehouse area. They are to be stored in the designated storage areas only.

l. Will Calls for Controlled Substances:

(1) CII Controlled Substances

Each Distribution Center shall maintain a policy prohibiting the sale of CII controlled substances on waiting or will call orders. This merchandise must be delivered to the purchaser's address of record via normal truck delivery.

Exception: A doctor or pharmacist may present DEA Form 222 to the distribution center in person to meet an emergency. The DEA has said to meet an emergency we may deliver such substances ordered if we know the doctor or pharmacist presenting the order form. This should be a rare occasion, however, as such orders must be delivered to the address on the order form.

(2) CIII-V Controlled Substances

The Code of Federal Regulations does not prohibit will call orders for CIII-V controlled substances. However, the DEA is concerned with the potential for diversion in such transactions. Therefore, the following procedures must be followed.

Distribution Centers permitting will call transactions must create and maintain a "Will Call Log" to document that the procedures below have been followed, and such log should contain the signature of each person involved with each will call procedure.

DC personnel must verify that the person calling in the will call order for a controlled substance

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-27:SEC.III.10

CIII-V and the person picking up such order are actually authorized by the registered customer to do so.

A telephone call from the DC to the registered customer, as determined by McKesson's customer registration records, to determine the validity of the order and the identification of the person picking up the order is required.

The person designated by the registered customer to pick up the will call order must sign documentation at the DC as proof of delivery and receipt.

DC personnel should require and record valid identification, such as a driver's license, for the person picking up the order. Make a photocopy of the identification for the DC's records.

m. Shipping Destination:

Under no circumstances is merchandise to be shipped to an address other than that of the actual purchaser (e.g., an order from a doctor must be shipped to the doctor, even though it is billed to a drug store).

NOTE: SHIPMENT TO A POST OFFICE BOX IS NOT ALLOWED UNDER ANY CIRCUMSTANCES.

n. Abnormal Office/Warehouse Work Hours:

Whenever the office or warehouse is open past normal business hours or on a Saturday, Sunday, or holiday, all outside doors are to be kept locked. Where possible, the outside main entrance door should be equipped with a self-locking device that can be actuated immediately after the majority of employees have left the building for the day.

See also Section 10 regarding advance, written notice to alarm company regarding unusual hours of work.

o. Electronic Protection Walk Tests-Cage & Vault:

IMPORTANT: The electronic protection of the caged area for Schedules III, IV, and V must surround the outside perimeter of the cage. Distribution Center Management

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-28:SEC.III.11

is expected to "walk test" the vault and cage alarm systems on a monthly basis, and check the alarm company's central office response. MAINTAIN A WRITTEN RECORD OF SUCH TESTS FOR DEA REVIEW ON THE DEA WALK TEST LOG (SEE EXHIBIT 55-36).

2. Alarm Systems:

Alarm system failures cannot be ignored. Professional burglaries are frequently signaled in advance by seemingly innocent failures.

All breakdowns in an alarm system must be documented on the Alarm Log (see Exhibit 55-37) and repaired immediately. If the breakdown continues over a non-work period, an on-site guard is required during the time the system will be "down." SUPERVISORY PERSONNEL MUST REMAIN ON THE PREMISES, WITH ALL THE PERIMETER OPENINGS LOCKED, UNTIL THE NECESSARY REPAIRS ARE MADE, OR A PROFESSIONAL GUARD IS PROVIDED.

Alarm companies are doing business with customers that require less security than drug distributors. McKesson management must be extremely careful and maintain constant communication with their local alarm company—fewer than 10% of the alarm company's customers require the same intense security as McKesson Distribution Centers.

Cable cutting and system compromising are the most frequent methods being used today to gain building entrance. Failure to react to protection needs in the event of such acts could result in major loss of merchandise. NO ALARM CAN BE IGNORED.

3. Rules for Handling Controlled Substances

a. Receiving:

Schedule II controlled substances must be taken to the vault and Schedule III-V controlled substances must be taken to the cage immediately after identification and initial check-in. No controlled substances may be left in the receiving room overnight or during periods when the receiving room is not under adequate surveillance.

NOTE: IF MERCHANDISE CANNOT IMMEDIATELY BE TAKEN TO THE VAULT OR CAGE, IT IS ACCEPTABLE TO STORE SCHEDULE II-V CONTROLLED SUBSTANCES IN A LOCKED, ROLLING STEEL SECURITY CAGE WHILE AWAITING TRANSPORTATION TO THE

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-29:SEC.III.12

SECURED STORAGE AREA. THE STEEL CAGE SHOULD BE TAKEN TO THE VAULT OR CAGE AS NECESSARY AND NO LESS OFTEN THAN AT THE A.M./P.M. BREAK, LUNCH AND END OF DAY.

b. Returns from Customers

As with receipts from suppliers, all controlled substances returned from customers must be taken immediately to the vault or cage for check-in. No return of controlled substances may be left outside the vault or cage overnight.

NOTE: IF MERCHANDISE CANNOT IMMEDIATELY BE TAKEN TO THE VAULT OR CAGE, IT IS ACCEPTABLE TO STORE SCHEDULE II-V CONTROLLED SUBSTANCES IN A LOCKED, ROLLING STEEL SECURITY CAGE WHILE AWAITING TRANSPORTATION TO THE SECURED STORAGE AREA. THE STEEL CAGE SHOULD BE TAKEN TO THE VAULT OR CAGE AS NECESSARY AND NO LESS OFTEN THAN AT THE A.M./P.M. BREAK, LUNCH AND END OF DAY.

c. Control of Vault and Cage:

These areas must be kept locked at all times and opened only when the employee responsible for controlled substances must enter. The keys for the vault day-gate and the cage must be kept by the Order Filler except at breaks and at the close of business when they are to be given to a Warehouse Supervisor, Operations Manager, or supervisory employee responsible for that work shift.

d. Filled Orders for Controlled Substances:

After orders for controlled substances are filled on sales orders or debit memos, they must be staged in the vault or cage while awaiting shipment. Distribution Centers without adequate staging space in the vault or cage for schedule II-V controlled substance orders or a DEA approved cage in shipping must use steel, rolling locked security cages for staging. They must not be left in the shipping room or elsewhere outside the vault or cage unless they are under constant surveillance until they are placed in the secured storage area of the delivery truck. Storage in the cab of the delivery truck is prohibited. All unshipped orders must be returned to the vault or cage for protection.

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-30:SEC.III.13

The only exception allowed for Schedule II-V controlled substances is where a fully protected cage meeting all DEA specifications is located in the shipping room. Such cage must have the approval of DEA before being put to use.

e. Releasing Orders for Shipment:

In order to track the handling of controlled substances from the cage or vault to the customer, a DEA Control Log has been created (see Exhibit 55-42). This document will be printed whenever a route manifest is printed (Job DI11) and should be taken to the cage or vault with the printed pick documents.

The DEA Control Log Report will contain one line for each pick document page with a controlled substance line item. The log will be printed with the same extract criteria and sort as the route manifest. As each pick document page is filled by the controlled substance order filler, the tally columns should be completed. After all controlled substance pages for each route have been filled, the log should then be placed with the merchandise for driver acknowledgment. After the route driver or other designated employee has signed for the appropriate pages, a copy of the log should be made and retained with the DEA pick document pages. Line-haul Drivers must verify pages and sign the DEA Control Log for all routes being transported on the Line-haul Truck. Upon arrival at the cross-dock, the route driver verifies pages and signs the DEA Control Log. The original copy must remain in either the security cage or vault, depending on DEA classification. The shipping clerk will notify the warehouse supervisor or other designated employee when a particular route is loaded and ready to receive the applicable controlled substances. An alternative is to provide a cage in shipping for DEA orders, but this cage must be equipped with required security equipment, and must be approved by the DEA.

If a shipping room cage is used, all unshipped orders must be returned to the controlled substance cage or vault and be held for future delivery.

f. Delivery Truck:

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-31:SEC.III.14

No orders for controlled substances or returns from customers of controlled substances may be left on our delivery trucks overnight. The merchandise must be placed in the vault or cage.

D. Verification of Customer Registration-1301.74

The DEA has concluded that under Section CFR 1301.74(a) the distributor is responsible not only for the initial verification of registration prior to the first shipment of controlled substances to a registrant, but also for the periodic monitoring of the status/validity of that registration as well.

Before a new account is loaded, it is the responsibility of the Retail Account Manager to "sight-verify" the controlled substance schedules the registrant is licensed to purchase and obtain a photocopy of the registration certificate. Schedule eligibility is then loaded in the customer record. Orders for controlled substances are then passed through two edits.

The first edit is to check if the DEA customer flag is turned on. If "yes," the second level of edits will be invoked to match an RXDA code value on the item master file. If there is a match, the item passes the edits and processing continues. Otherwise, the item will be rejected from the customer's order, and an error message will appear on the customer's transaction audit report.

In the absence of sight-verification or registration certificate, the Distribution Center Manager must verify through the DEA Registration Unit in Washington DC or through the Field Division Office, the validity of the registrant's DEA number. When this procedure is necessary, the approval date and the name of the DEA Special-Agent-In-Charge validating the DEA number must be documented in writing.

Chain store accounts, e.g., Wal-Mart, are loaded centrally. It is the responsibility of the National Account Manager to obtain a copy of the registration certificate and forward it to the servicing Distribution Center(s) prior to any orders being placed for order fulfillment are subject to the same verification guidelines outlined above.

NOTE: IF THE REGISTRATION MUST BE VERIFIED THROUGH THE DEA, IT IS STILL THE RESPONSIBILITY OF THE RETAIL ACCOUNT MANAGER TO "SIGHT VERIFY" AND OBTAIN A PHOTOCOPY OF THE REGISTRATION CERTIFICATE WHEN THE REGISTRATION CERTIFICATE IS RECEIVED BY THE CUSTOMER.

1. DEA Number Expiration Report (DR-48)

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-32:SEC.III.15

This monthly report is automatically generated at each Distribution Center on the 20th of each month. It will list all customers, by sales territory, with DEA numbers that expire in the next 60 days. The Distribution Center will receive two copies. One copy is for the Distribution Control file and one copy is for distribution to the RAM's at the end-of-month sales meeting. RAM's are to sight-verify each registrant's DEA certificate listed on this report and attach a copy of the customer's renewal to the report.

NOTE: THE DR-48 REPORT WILL ALSO LIST THOSE McKESSON DC'S THAT ARE ON YOUR CUSTOMER FILE. YOU MUST SIGHT-VERIFY THESE CERTIFICATES BY REQUESTING A COPY OF THEIR MOST RECENT CERTIFICATE AND VERIFYING THOSE ITEMS LISTED IN NUMBER 2. "REGISTRATION ITEMS TO BE VERIFIED."

2. Customers With DEA Registrations With Incomplete RXDA Schedules (DT51)

This is an On-Request Report (DT51) that can be requested at any time showing all customers with incomplete RXDA schedules (see Exhibit 55-31). This report must be run at the beginning of every month and be posted in the cage and vault.

3. Registration Items to be Verified

- a. Name-individual and/or trade name;
- b. Address-including city, state, and zip code;
- c. Registration Number;
- d. Expiration Date; and
- e. Schedules Authorized for that registrant-II, IIN, III, IIIN, IV, V.

Exhibit 55-4a is a sample of the DR-48 report to be utilized for this verification.

In the event any customer's renewal does not show authorization for all six classes, this should be brought to the customer's attention as this may be an error in the renewal process. Any customer who is or previously was able to complete DEA Form 222 and is not registered for both II & IIN should be advised that Schedule II DEA Form 222 cannot be filled until the error is corrected or until DEA authorizes us to fill them pending the receipt of the corrected renewal. The RAM should note this problem on the returned copy of DR-48.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-33:SEC.III.16

4. Completed Report

Upon completion, the DEA number expiration report must be returned to the Distribution Center Manager for a check against the control file copy to verify entire report is returned.

5. Update Customer File

- a. The report (DR-48) is then given to the individual (usually the District Sales Manager's secretary) responsible for on-line customer file maintenance. If the registrant does not have schedules 2, 2N, 3, 3N, 4 or 5 appearing on his certificate of registration (DEA Form 223) then file maintenance to the "DEA-ELIG" field on the Customer Basic-1 information screen will be required. Controlled substance schedule values are as follows:

HOSS File	Controlled Substance Schedule	DEA Elig Field Value
X	2	X
X	2N	Y
B	3	B
D	3N	C
D	4	D
E	5	E

NOTE: The HOSS National Item File has only four RXDA code values. There are six controlled substance schedules and six corresponding "DEA ELIG" field values. Since there is not a one-to-one match for 2/2N and 3N/4, the following rules apply:

- (1) Customers eligible to purchase schedules 2/2N require both "X & Y" in the "DEA ELIG FIELD."
- (2) Customers eligible to purchase schedules 3N/4 require both "D & C" in the "DEA ELIG FIELD."

It will be the responsibility of Distribution Center Management to verify and prevent Methadone Clinic customers from ordering schedule 2N items if not authorized. The same rule also applies to schedule 3N/4 items.

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-34:SEC.III.17

- b. If the registrant is not licensed to purchase all controlled substance schedules and attempts to do so, the following error message will appear on the customer's transaction audit report:

"DEA CERTIF REQUIRED FOR THIS SCHEDULE" (see Exhibit 55-32). For CRT Order Entry, the on-line screen error message displayed will be "DEA CERTIF REQUIRED FOR THE PURCHASE OF THIS SCHED."

6. Maintain Reports for DEA Review

We must maintain a file of this verification document (DR-48) or other supporting documentation such as copies of customer DEA certificates for review by the DEA. The retention requirement is three years.

7. Retention of Discontinued Customer DEA Certificates

When a customer is deactivated, place a note on its DEA certificate, "Customer deactivated on [date]: Destroy on [date two years hence]." Leave this certificate in the "DC DEA Certificates" file for easy retrieval. Once the destroy date has been reached, remove and destroy the certificate.

E. Explanation of Expiration Dates for DEA Registration Numbers

<u>Renewal Letter</u>	<u>Expiration Date</u>
A, D	June 30
B	July 31
C, E	August 31
F, G	September 30
H, N	October 31
I, T	November 30
J, K, O	December 31
M	January 31
S	February 28
L, P	March 31
Q, R, 9	April 30
U, V, W, X, Y, Z	May 31

The "Renewal Letter" is the second alpha character of the DEA registration number.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-35:SEC.III.18

F. Invalid or Expired Certificate—Action Required

If you discover, in the process of registration verification, an invalid or expired registration certificate, the following action must be taken:

1. Name Incorrect

File maintenance to the customer basic information screen will be required—provided the registration has been properly issued and is being used by the individual/store to whom it was originally issued. If not, you must discontinue shipping controlled substances to the registrant (customer).

2. Address Incorrect

If address on registration is the correct address for the registrant (customer), you must correct your customer master records. If the address on the certificate is incorrect, you must discontinue shipping controlled substances to the registrant (customer).

3. Registration Number

If the DEA number on file is not the same as the number shown on the registrant's certificate, you must correct the information to agree with registrant's registration number.

4. Registration Certificate

If the registrant's (customer) certificate has expired, you must discontinue shipments of controlled substances to the registrant (customer). Exception: There are instances when a valid registrant (customer) may not receive the new registration certificate prior to the expiration of the old certificate. When such a condition exists, you may verify that the renewal is in process through the DEA Registration Unit in Washington DC, or through the DEA Field Division Office and, with approval, continue shipments. When this procedure is necessary, the approval date and the name of the DEA Special Agent-In-Charge giving the approval must be noted on the verification sheet (Exhibit 55-51).

In the event the DEA Registration Unit in Washington DC or the Field Division Office will not verbally validate a customer's re-registration and the customer submitted the re-registration form at least 45 days prior to expiration, the guidelines below must be followed:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-36:SEC.III.19

- a. Request copies of the check or re-registration application form from the customer;
- b. Upon receipt of the check copy or re-registration application, extend the customer's expiration date on the system to 30 days beyond expiration (see 21 CFR 1301.47). This will cause the customer to continue appearing on the DT51 and DR48 reports until you receive the new registration.

5. Schedule Shipments

You must carefully instruct employees not to ship controlled substances to registrants (customers) for schedules not listed on the registration certificate. Generally, a registrant approved for Schedule II is also planning to distribute all schedules other than Schedule I. A missing schedule is usually an oversight. Therefore, if you find a missing schedule on a registration certificate (or DEA Form 222), you should follow the same procedure as in item 4. above.

G. DEA Continuing Education Documentation

All Compliance training sessions (formal and informal) held in your Distribution Center must be logged and documented on the DEA Continuing Education Report (see Exhibit 55-33).

Send copies of the completed report to your Director of Distribution and Quality, and Vice President Distribution Operations. File the original report in the internal Distribution Center DEA File. THIS DOCUMENTATION COULD PROVE EXTREMELY USEFUL IN DEMONSTRATING OUR ONGOING COMMITMENT AND EFFORTS TO ENSURE COMPLIANCE WITH THE CONTROLLED SUBSTANCES REGULATIONS.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-37:SEC.III.20

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-38:SEC.IV.1

IV. SUSPICIOUS ORDERS

A. Detecting Suspicious Orders-1301.74

1. Definition and Responsibility

DEA Regulation defines suspicious orders as follows:

"Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency."

The Regulations further state our responsibility and the actions required of us in regard to reporting unusual or suspicious purchases of controlled substances by our customers:

"The registrant shall design and operate a system to disclose, to the registrant, suspicious orders of controlled substances. The registrant shall inform the Field Division Office of the Administration in his area of suspicious orders when discovered by the registrant."

Recent cases indicate that DEA will seek large penalties from distributors who fail to comply with this regulation. It is left to the distributor to define what constitutes an unusual or suspicious order. To comply with these regulations, the following reports and suspicious order definitions have been developed by McKesson, and have been accepted by DEA as a guideline for all distributors of controlled substances.

Please note the following extract of a letter from Mr. Gene R. Haislip, Director, DEA Office of Compliance & Regulatory Affairs, dated November 10, 1980:

". . . I would like to state that these guidelines as presented appear to be appropriate for implementation and would serve as an effective instrument in accomplishing the requirements set forth in Title 21, Code of Federal Regulations, Section 1301.74. However, it must be understood that these criteria can only be properly evaluated for effectiveness subsequent to implementations" (see Exhibit 55-5 for the full text of the letter).

Because these guidelines have been accepted by DEA, compliance with them is mandatory for all McKesson Drug Distribution Centers.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-39:SEC.IV.2

## 2. Computer Reports

The following reports are produced by the Drohan Data Center:

- a. Controlled Substances Sales Report, DR49L100 (Exhibit 55-6): a monthly recap of all controlled substance sales in vendor/item sequence. It prints monthly at the DC and reflects quantity sold by customer number, customer name, invoice number, and date.

This report must be retained with your records for two years.

NOTE: STATE LAW RECORDKEEPING RETENTION REQUIREMENTS MAY BE LONGER THAN THE FEDERAL REQUIREMENT OF TWO YEARS AND SHOULD BE VERIFIED ACCORDINGLY.

- b. Controlled Substance Customer Purchase Report, DR49L200 (Exhibit 55-6a): a monthly recap of all controlled substances purchased by each customer. Schedule II items are listed separately from Schedule III-V and the purchases of each item are totaled for the month. A twelve-month history of purchases of each item purchased during the month is printed on the report.

Distribution Centers receive two copies (printed by the Drohan Data Center by the third workday) of this report, one for internal use, and one to be forwarded to the respective customers.

- c. Daily Controlled Substance Suspicious Order Warning Report, DU45L500 (Exhibit 55-46): when an order is entered through the central system (EOE or CRT), controlled substance items are extracted (after passing through front end order processing) and compared in a subroutine to the purchases month-to-date by customer/customer average purchases, average purchases by customer class and product.

The same factors that are used for the Customer Recap Variance Report are also used for the Daily Controlled Substance Suspicious Order Warning Report (3X monthly average for schedule II and III reportables and 8X/monthly averages for IIIN-V.)

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-40:SEC.IV.3

NOTE: THIS PROCESS DOES NOT DELAY DM10 OR LOCAL ORDER PROCESSING.

- d. Monthly Controlled Substance Suspicious Purchases Report, DU45L650 (Exhibit 55-47): at the end of the month (1st workday of following month) you will receive the Monthly Controlled Substance Suspicious Purchases Report. This report is a mirror image of the daily report. The only difference between the two reports is that the monthly report reflects items/quantities actually billed to the customer (including returns) that met the reporting criteria during the month.
- e. Monthly ARCOS Customer Recap Variance Report, DR46R35A: the monthly "ARCOS Customer Recap Variance Report" DR46 (see Exhibit 55-7 pages 1-4) reflects purchases for Schedules II-V controlled substances if there is a base code assigned to the item. The "Factor" on all controlled substances is determined by the DEA. The "Factor" multiplied by the monthly average equals "Ingredient Limits." All transactions listed are in excess of the guidelines accepted by DEA and, therefore, may be considered reportable, suspicious, or unusual.

#### B. Reporting Suspicious Orders

With the release of the Daily Controlled Substance Suspicious Order Warning Report there are several significant advantages to enhance our compliance efforts:

The system monitors customer orders/purchases for all Controlled Substance Schedules II, IIN, III, IIIN, IV, V based on the historical averages for the customer/customer class and product/product class. The Drohan Data Center will generate the Daily Controlled Substance Suspicious Order Warning Report every two hours, twenty-four hours a day. This report can be faxed to your local DEA district office before the order is shipped.

It does not rely on an individual's judgment or knowledge to determine reporting appropriateness but rather on statistical fact.

##### 1. Suspicious Order Warning Report

Every two hours, twenty-four hours a day, the Drohan Data Center will generate the Daily Controlled Substance Suspicious Order Warning Report for orders that meet the

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-41:SEC.IV.4

reporting criteria. Customer orders for items that exceed the 3X/8X monthly average will print as a suspicious order on the report (Exhibit 55-46). If the conditions do not exist, no report will be generated. Data elements of the report are:

- a. Prints in route/stop sequence;
- b. Customer information includes name, telephone number, address, route, stop and DEA #;
- c. DC information includes DC name, number, address, telephone # and DEA #;
- d. FEOP (Front End Order Processing) transaction control number distinguishes one order from another;
- e. FEOP date;
- f. Item number;
- g. NDC number;
- h. Selling description;
- i. Generic description;
- j. Unit of measure;
- k. Quantity ordered;
- l. Controlled Substance schedule;
- m. Item monthly average, factor, and item limit; and
- n. Disclaimer.

2. Action In Response to Report

- a. The DCM/OM/WS or designee must review the report and sign in the space provided indicating it has been reviewed.
- b. Fax a copy immediately to your DEA District office (See Fax number, Exhibit 55-45). If the quantity ordered by the customer is obviously a duplicate order or an ordering error, you should contact the customer to confirm the quantity and cancel the order or cut back the quantity. If an order is canceled or cut back do not fax to DEA.
- c. Attach the Fax Verification note (provides proof of successful Transmission/Date/Time) to the copy of the report.
- d. File the copy in your "Suspicious Order Warning Report" folder and keep each folder by month for two years.

NOTE: IF AT ANY TIME YOU RECEIVE A FAX OR PHONE CALL FROM DEA RELATING TO THE DAILY REPORTS YOU HAVE FAXED TO THEM YOU SHOULD BE GUIDED BY THE FOLLOWING:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-42:SEC.IV.5

- If the DEA response requires specific action such as holding shipments or restricting quantities contact Operations Support or the Law Department for guidance.
  - DO NOT discontinue faxing the Daily Controlled Substance Suspicious Order Warning Report or sending the monthly report just because your district DEA office tells you they do not want them. We are required by federal law to report suspicious orders and are not to stop just because a district office tells you to. If this becomes a problem for you, contact Operations Support or the Law Department for help.
- e. Both The Monthly Controlled Substance Suspicious Purchase Reports and The Monthly ARCOS Customer Recap Variance Report must be sent Certified Mail, "Return Receipt Requested," to your local DEA District Office (Exhibit 55-45) with the accompanying cover letter (Exhibit 55-8).

File the duplicate copies of both reports with a copy of the transmittal letter and attach the "Acknowledgment of Receipt" when it is returned to the Distribution Center. Reports are to be retained for two years, or longer if required by the state in which you are located.

3. Detailed Support for Customer Purchases

If after receipt and examination, your regional DEA office needs detailed support for a particular customer's purchases shown on the ARCOS Customer Recap Variance Report, you can request a DR47 (Exhibit 55-7, pages 3 and 4) that provides data on purchase date, invoice number, and purchase quantities by selling unit.

The DR47J0 is an on-request job and Distribution Centers may choose to print a single customer or all customers. (See AS400 Run Book, chapter 17 for instructions, Job DR47J0XX.)

4. Continued Reporting Responsibility

Forwarding these reports to the DEA does not relieve the Distribution Center of responsibility to review the reports and note order quantities of unusual size. Where such transactions are noted, notify DEA by telephone call and refer to the line item of the submitted report. Record the

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-43:SEC.IV.6

reporting call in the Unusual Purchase Notification Log (Exhibit 55-9).

5. Order Filler Awareness

ALL SCHEDULE II ORDER FORMS MUST BE REVIEWED AND INITIALED BY A DISTRIBUTION CENTER MANAGER OR HIS OR HER DESIGNEE PROPERLY TRAINED IN DEA FORM 222 COMPLIANCE BEFORE FILLING.

The review of DEA Form 222 is our best insurance against possible violations with respect to the normal distribution of controlled substances.

Controlled substance order fillers must be aware of our responsibilities. They are expected to report to management any unusual purchase request before orders are filled.

Management (Shift Supervisor) will determine if the quantity requested will be filled entirely and record the information on the DEA Unusual Purchase Notification Log (see Exhibit 55-9).

In most cases, it will be the responsibility of the DCM to notify the DEA by telephone during daytime work hours and complete the remainder of the log. A copy of the DEA Unusual Purchase Notification Log should be mailed (Certified Mail, "Return Receipt Requested") once a month to the DEA Regional Office in charge. The original copy (with receipt acknowledgment attached) should be filed for further reference if necessary.

6. Retail Account Manager's Responsibilities

Our Retail Account Managers can provide another source of useful information. In fact, reports of controlled substance diversion are not only a necessary part of an overall security program, but also serve the public interest at large.

The DEA has taken the position that an employee who has knowledge of controlled substance diversion has an obligation to report such information to her or his employer. Sales representatives are to be periodically reminded of this responsibility at sales meetings.

NOTE: IT IS RECOMMENDED THAT RETAIL ACCOUNT MANAGERS SHOULD NOT, UNDER ANY CIRCUMSTANCE, PREPARE AN ORDER ON DEA FORM 222 FOR THE CUSTOMER.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-44:SEC.IV.7

7. Emergency Orders for Schedule II Controlled Substances

Any "Emergency Situation" regarding Schedule II Controlled Substances being distributed without DEA Form 222 must be coordinated prior to shipment with the local Drug Enforcement Administration office. The use of a FAX transmission does not replace the necessity of following up an emergency distribution with a DEA Form 222 as required in 21 CFR 1305.03. (See page 55-86 for Facsimile Best Method Procedures.)

RUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-45:SEC.IV.8

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V. INVENTORIESA. Definitions and General Instructions-1304.11

Physical inventory counts of controlled substances follow the procedures for first and second counts as detailed in the Accounting Manual's physical inventory instructions.

Physical inventory counts of controlled substances may be taken by employees who also fill orders for controlled substances.

The second count must be independent (separate count sheet) of the first count and should be taken by a management person or as designated by the Distribution Center Manager.

Count sheets for first and second counts must be signed by the counter, dated and time of count noted in writing. These sheets are reconciled, and then transferred to the consolidated count book. The DCM or designee must then sign, date, and note the time of day on the consolidated count book and release to the Computer Room Supervisor.

Inventories of controlled substances are identified and defined as follows:

- |          |   |
|----------|---|
| Initial  | All items on start-up date for distributor and for those items newly transferred to controlled status.                                      |
| Monthly  | Schedule II and Schedule III ARCOS reportable controlled substances only (ARCOS)  |
| Annual   | At close of business on December 31, Schedule II and III controlled substances (ARCOS)  |
| Biennial | All controlled substances (Schedules II, III, IV, V) at close of business on April 30th of odd numbered years only (1995, 1997, 1999, etc.) |

Each inventory shall contain a complete and accurate record of all controlled substances on hand on the date the inventory is taken. Controlled substances shall be deemed to be "on hand" if they are in the possession of, or under the control of, the registrant, including substances returned by a customer, substances ordered by a customer but not yet invoiced, substances stored in a warehouse on behalf of the registrant (or for the account of a customer), and damaged controlled substances awaiting DEA approval for disposition.

1. Initial Inventories-1304.12

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-47:SEC.V2

- a. All Distribution Centers in existence in the fall of 1973 took initial inventories on entry dates prescribed by ARCOS. The inventories were entered on DEA Form 333 in duplicate. One copy was sent to Washington, and one copy was retained at the Distribution Center.
- b. An initial inventory is to be taken of all controlled substances on hand when a new Distribution Center is opened and must be taken before the first sale takes place.

2. Inventories for newly controlled substances-1304.14

- a. An initial inventory of any item stocked must be taken on the effective date that DEA transfers such item(s) from a non-controlled to a controlled substance.
- b. An initial inventory also is required also when a controlled substance is reclassified by DEA into a reportable schedule, on the date the reclassification becomes effective.
- c. Computer Room files the initial inventory diskettes. These will be treated as transactions and will be used as input to the month-end ARCOS edit program that determines the Distribution Center has accounted for all the ARCOS reportable items that have been shipped.

3. Monthly Inventories-ARCOS

Company policy requires that month-end inventories be taken of all ARCOS reportable controlled substances (Schedule II and Schedule III ARCOS reportable controlled substances).

4. Annual Year-end Inventories

Only the month-end December inventory each year is to be submitted to ARCOS. This is otherwise a normal monthly ARCOS inventory.

The inventory is submitted on a tape separately from the month's transactions (receipts, disbursements, corrections) by the Data Center from the inventory counts transmitted to the Data Center by the Distribution Center. This separate tape must be dated December 31 of each respective year.

5. Biennial Inventories 1304.13

McKesson Distribution Centers are required to take their biennial inventories of all controlled substances at the close of business on April 30th of all odd numbered years (1995, 1997, 1999, etc.).

NOTE: PERMISSION MUST BE RECEIVED IN WRITING FROM THE FIELD DIVISION OFFICE OF THE DEA TO TAKE THIS INVENTORY ON ANY DATE OTHER THAN APRIL 30.

These biennial inventory sheets must be marked in the top headings of the first page only of each group of sheets:

INVENTORY OF CONTROLLED SUBSTANCES AT CLOSE OF BUSINESS-APRIL 30, 19\_\_\_. (See Inventory Counting Procedures, page 55-49.)

This mandatory inventory should be noted in a bring-up file about 15 days before the inventory date.

B. Inventory Listing Procedures

The following procedures are to be used for all inventories-initial, monthly, annual year-end, biennial-and for newly controlled and/or ARCOS reportable items.

Receiving Department Check:

NOTE: MAKE CERTAIN THAT ALL CONTROLLED SUBSTANCES THAT HAVE COME INTO RECEIVING PRIOR TO THE CLOSE OF BUSINESS BEFORE INVENTORY HAVE BEEN BROUGHT TO THE PROTECTED AREAS, CHECKED IN, AND STORED. on the shelves before the inventory count begins. Check carefully for customer returns.

1. Run Creating DU10 ARCOS Physical Inventory Prelist Count Sheets

Prints physical inventory count sheets in alpha sequence by location. (See Run Book, Chapter 17, DU10 pages 1-5.)

- a. To generate your monthly count sheets, run DU10. (See CRS Run Book, Chapter 17, DU10, pages 1-5.) This program prints your count sheets in warehouse location sequence in the cage and in the vault by selecting parameter BX (See page 2 of DU10 Run Book instructions). You will receive separate inventory listings for Schedule II controlled substances and Schedule III ARCOS reportable controlled substances.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-49:SEC.V4

The computer will print your monthly inventory sheets in location sequence by station. You will also receive a "First Count," "Second Count," and "Consolidated Count." (See Exhibit 55-26.).

- b. Annual and biennial inventories--there are parameters that can be optioned to print all controlled substances. (See Run Book instruction, Chapter 17, DU10, pages 1-5.)

## 2. Inventory Counting Procedures

### a. Date and Time of Count

Count the inventory after the close of business for each of the required inventories previously described, or before the start of business on the day following. The first page of each set of count sheets must be marked with the date and time taken, and whether it was taken at the opening or closing of business on that date.

NOTE: CLOSE OF BUSINESS IS DEFINED AS BEING AFTER ALL RECEIPTS PROCESSING/RETURNS PROCESSING FOR MERCHANDISE THAT ARRIVED AT THE DISTRIBUTION CENTER THE DAY INVENTORY IS TO BE TAKEN IS COMPLETE.

### b. Sheet Headings

The first page only of each Count Book requires the employee's name, the date and the time that the physical count is started.

### c. Count In Sequence

Normal Physical Inventory procedures must be used. If while counting, an item appears on the shelf that is not on the count sheet, enter an asterisk after the last item counted and write in the unlocated item at the bottom of the count sheet. (See Exhibit 55-25.).

### d. Multiple Locations

If an item is stored in more than one location in the vault or cage -- such as shelf stock, full case stock, or damaged merchandise--it must be entered separately for each location on the count sheet. (See Exhibit 55-25.).

e. More Than One NDC Code

If an item has been received with two different NDC codes, the item must be listed twice — once for each NDC code—and counted separately.

f. Write-ins

Two spaces at the bottom of each page are available for write-ins. (See Exhibit 55-26.).

g. Partial Content Counts

Where partial bottles of damaged or returned bottles are involved, the DEA accepts an educated estimate rather than requiring a count of each dosage unit: a bottle of 100 half full is to be estimated as 50.

h. Entries in Selling Units

Enter the inventory first counts on the pre-lists in selling units as determined by the item description on the item/shelf labels.

i. Full Case Units

When counting full cases, enter the number of cases and the number of selling units per case. Multiply to determine the number of selling units to be entered in the quantity column: two cases time 12 selling units per case equals 24 each. (See Exhibit 55-27).

j. First Count

The employee completing the first count should enter his or her name, date, and time on the first page of the count book. The first counter must work independently from the second counter.

k. Independent Second Counts

An independent second count must be taken using the second count book. This second count must be taken by an employee designated by the Distribution Center Manager and must occur in a separate time period. The second counter must enter her or his name and the time

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-51:SEC.V6

on the first page of the count book, and work independently from the first counter.

Assign an exempt supervisor to second-count the inventory at least once every third month.

1. Differences Verified and Reconciled

When these counts are completed, the differences between first and second counts must be verified by an exempt supervisor other than the second counter, and the necessary reconciliations made. The final count must then be transferred to the consolidated count book. (See Exhibit 55-28). It is desirable that an exempt manager transfer the final counts onto the consolidated count book but not mandatory.

In the absence of an exempt supervisor, their designee, who is properly trained in controlled substance inventory procedures, can conduct the reconciliations and/or the transfer the final count to the consolidated count books. Under no circumstances can the designee be the same person who completed the first or second inventory counts.

The DCM or the designee responsible for taking the inventory must then sign, date, and note the time of day on the first page of the Consolidated Count Book and release to the Computer Room Supervisor for data entry. In the event the DCM is unavailable for legitimate reasons, the DCM's designee may approve and sign for submission to the Computer Room. Upon the availability/return of the DCM, it is his or her responsibility to review and sign the submitted Consolidated Count Book.

3. Computer Room Data-entry

a. Monthly Inventories-ARCOS

Use the computer-prepared ARCOS Physical Inventory Prelist (DU10) to enter inventory counts after the close of business at the end of each month. Follow the instructions in job DU40, Chapter 17 of the Run Book. These counts must also be entered in selling units as code "3" ending inventory.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-52:SEC.V7

- (1) Data-entry must be completed by the end of the first work day of the following month.
- (2) Computer Room uses diskette to prepare the edit listing (used to determine discrepancies) for the Operations Manager.
- (3) When all discrepancies have been reconciled, this diskette, with errors corrected, is used as an input to the final ARCOS program.

b. Reclassified Products Initial Inventory

When products already on hand are reclassified by DEA into ARCOS reportable schedules, an initial inventory of these products must be taken for ARCOS on the date the reclassification became effective and entered as a code "1" beginning inventory. Be sure to enter Location Maintenance if a move is involved.

NOTE: NEW ARCOS REPORTABLE CONTROLLED SUBSTANCES RECEIVED (NOT PREVIOUSLY STOCKED OR RECEIVED WITH NEW NDC CODES) MUST BE ADDED TO THE WAREHOUSE LOCATION MAINTENANCE. BE SURE TO ENTER THE WAREHOUSE LOCATION FOR EACH ITEM. NO INITIAL INVENTORY OF THESE ITEMS WILL BE REQUIRED AS THEY ARE INTRODUCED INTO ARCOS REPORTING THROUGH THE USE OF THE "P" CODE.

C. Post Inventory Procedures

1. Management Review

The Distribution Center Manager must review all inventory sheets carefully to make sure that a count or a "none" has been entered for each listed item.

2. Signatures on Inventory Sheets

Each group of count books must be signed by the Distribution Center Manager .

3. File Retention

File the Consolidated Final inventory sheets in the vault, DEA cage, or in a separately secured area to be retained for two years, or longer if required by the state in which you are located. (Also see Recordkeeping, page 55-55.) The first and second count sheet documents must be kept in the DC's

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-53:SEC.V8

DEA working file and disposed of on a continuous basis 90 days after the inventory date.

4. Checking Accuracy of Inventory of Controlled Substances

The accuracy of your controlled substances may be checked through a physical check of a printout of items coded X, B, D, and E on the Distribution Center inventory file against the items that you have stored in the vault or cage. Request a DF68 printout for Pick Departments JB & JE for ARCOS reportable items and JA, JC, JD, and JZ for the non-reportable controlled substances. If items on this report show a location other than that of the vault or cage they must be immediately moved and relocated to the vault or cage.

5. Semi-Annual Physical Inventory-All Distribution Center Products

Most Distribution Centers have at least two opportunities a year (excluding Controller ARCOS/non-ARCOS audits and DCM non-ARCOS audits) to identify potential problems involving control of non-ARCOS inventory. This occurs when physical inventory is taken. (Ref: Drug Accounting Manual 107.50.)

When DCIM is reviewing the updated item master, the DCM must be sure controlled substances receive priority attention for reconciliation. Any item that appears on the updated item master and also appears on the count audit report (greater than \$250.00) must be reconciled. Controlled substance items that must be reconciled are identified by the CII-CV symbology in the right hand column of the Updated Item Master Report.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

PAGE 55-54:SEC.V9

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-55:SEC.VI.1

VI. REGISTRANT RECORDSA. Registry (DEA) Numbers on Transfer Documents

All controlled substance transactions are traced by the Drug Enforcement Administration to the distributors through their respective DEA registration numbers. It is mandatory that DEA registration numbers appear on all documents of transfer as follows:

1. Purchase Orders/Receiving Records

The Distribution Center's DEA number and the supplier's DEA number (for point-of-shipment location).

2. Customer Credit Memos>Returns and Adjustments

The Distribution Center's DEA number and the customer's DEA number.

3. Sales Order/Picking Document Forms

The customer's DEA number.

4. Customer's Invoice

Distribution Center's DEA number and the customer's DEA number.

5. Debit Memos-Supplier and Affiliated Unit Transfers

The Distribution Center's DEA number and the supplier's or receiving affiliated unit's DEA number.

6. DEA Form 222

The entry of DEA numbers on this form is self-explanatory. Also see Exhibit 55-10 for entry of vendor's number when not otherwise shown on Purchaser's Copy 3 (field of key-entry).

B. Recordkeeping1. Maintenance of Records and Inventories-1304.04

"Every inventory and other record required to be kept under Part 1300 of 21 CFR shall be kept by the registrant and be available for at least two years from the date of such inventory or record, for inspecting and copying by

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-56:SEC.VI.2

authorized employees of the Administration, except that financial and shipping records (such as invoices and packing slips, but not executed order Form 222) may be kept at a central location." (See page 55-58.)

NOTE: STATE LAW RECORD RETENTION REQUIREMENTS MAY BE LONGER AND SHOULD BE CHECKED ACCORDINGLY.

The tightest possible recordkeeping system must be maintained for controlled substances in all Distribution Centers, so that when DEA inspectors audit these records they will be readily available, and discrepancies in actual merchandise movement from what the records show will be virtually nonexistent.

NOTE: THE DEA HAS IMPOSED SIGNIFICANT FINES FOR WHAT WOULD APPEAR TO BE MINOR TECHNICAL DEVIATIONS FROM THIS REQUIREMENT.

2. Dates Recorded-1304.21

In recording dates of receipt, distribution or other transfers, the dates on which the controlled substances are actually received, distributed, or otherwise transferred in or out of the Distribution Center's premises shall be used as the date of receipt or distribution of any documents of transfer (e.g., invoices or packing slips).

NOTE: THE DEA HAS IMPOSED SIGNIFICANT FINES FOR WHAT WOULD APPEAR TO BE MINOR TECHNICAL DEVIATIONS FROM THIS REQUIREMENT.

3. Current Basis of Recordkeeping-1304.21

Every registrant shall maintain on a current basis a complete and accurate record of each controlled substance received, sold, delivered, or otherwise disposed of, except that no registrant shall be required to maintain a perpetual inventory.

4. Retention Period for DEA Records

All DEA inventories and all DEA transaction records must be retained for two years from the date of the inventory or transaction, or longer if required by the state in which you are located.

5. Records Storage and Retention

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-57:SEC.VI.3

Records of controlled substance transactions are to be packaged and stored separately by the month, and marked for disposal in two years, or longer if required by the state in which you are located, from date of the month of transaction. Store each month's records in separate transfer file boxes.

According to the Code of Federal Regulations it is acceptable to store controlled substance records outside of the vault or cage-McKesson has in the past and will continue to store controlled substance records in the vault or cage, space permitting. Any exception to this McKesson policy must be requested in writing from your Vice President, Distribution Operations, and acknowledgment received in writing from the VPDO.

Assemble and maintain the required records as follows:

a. Disposal Transactions:

- (1) Sales order or item picking document control copies-batched sequentially by days for Schedule III-V items;
- (2) Debit memo copies-returns to supplier; and
- (3) DEA Form 222 Supplier Copy 1 in daily sequence for the month. Retention of the picking document copy is not required and should not be kept with monthly records.

b. Receiving Transactions:

- (1) Receiving records-copies of all receiving records, including backorders, sequentially by dates received for Schedule III, IV, and V items;
- (2) Credit memos-copies of all credit memos for return of schedule III, IV, and V items; and
- (3) DEA Form 222-Purchaser Copy 3 in daily sequence for the month. Retention of the receiving record is not required and should not be kept with monthly records.

c. Reports on File:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-58:SEC.VI.4

- (1) ARCOS final edit report for the month;
- (2) Customer purchases report;
- (3) ARCOS inventory records, monthly; and
- (4) ARCOS Customer Recap Variance Report.

- d. Biennial physical inventory of all Controlled Substances, taken on last work day of April of odd number years, and to be kept for two years, or longer if required by the state in which you are located. Each inventory must be clearly marked with the date and time at close of business April 30, 1995, 1997, 1999, etc.

6. Permit to Maintain Central Records

- a. With our system of separate recordkeeping for controlled substances and a document for every movement of merchandise, in or out, filed in the vault, cage, or other secured area, DEA agents may require additional records as they perform their audits. However, if suppliers' invoices and credit memos or other documents of transfer are maintained at a central location, such as the parent Distribution Center for a Rx operation or such as a Data Center, then permission for central recordkeeping must be requested and approval documented in writing from the Special-Agent-In-Charge for your Distribution Center.
- b. The letter requesting permission should be sent to your Special-Agent-In-Charge, NOT to Washington DC. The request is sent in triplicate, Certified Mail, "Return Receipt Requested."
- c. Upon receipt of the request, DEA normally sends the Distribution Center a form to fill out and return. DEA will then indicate approval on the form and return it to the Distribution Center where it should be filed permanently. The appropriate portion of the Regulations is quoted in section 1304.04-Maintenance of Records and Inventories:
  - (1) Every inventory and other records required to be kept under the Part shall be kept by the registrant and be available, for at least two years from the date of such inventory or record, for inspection and copying of authorized employee of the Administration. Financial and shipping records (such as invoices and packing slips but not executed order forms subject to 1305.13 of

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-57:SEC.VI.3

Records of controlled substance transactions are to be packaged and stored separately by the month, and marked for disposal in two years, or longer if required by the state in which you are located, from date of the month of transaction. Store each month's records in separate transfer file boxes.

According to the Code of Federal Regulations it is acceptable to store controlled substance records outside of the vault or cage—McKesson has in the past and will continue to store controlled substance records in the vault or cage, space permitting. Any exception to this McKesson policy must be requested in writing from your Vice President, Distribution Operations, and acknowledgment received in writing from the VPDO.

Assemble and maintain the required records as follows:

a. Disposal Transactions:

- (1) Sales order or item picking document control copies—batched sequentially by days for Schedule III-V items;
- (2) Debit memo copies—returns to supplier; and
- (3) DEA Form 222 Supplier Copy 1 in daily sequence for the month. Retention of the picking document copy is not required and should not be kept with monthly records.

b. Receiving Transactions:

- (1) Receiving records—copies of all receiving records, including backorders, sequentially by dates received for Schedule III, IV, and V items;
- (2) Credit memos—copies of all credit memos for return of schedule III, IV, and V items; and
- (3) DEA Form 222—Purchaser Copy 3 in daily sequence for the month. Retention of the receiving record is not required and should not be kept with monthly records.

c. Reports on File:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-58:SEC.VI.4

- (1) ARCOS final edit report for the month;
- (2) Customer purchases report;
- (3) ARCOS inventory records, monthly; and
- (4) ARCOS Customer Recap Variance Report.

- d. Biennial physical inventory of all Controlled Substances, taken on last work day of April of odd number years, and to be kept for two years, or longer if required by the state in which you are located. Each inventory must be clearly marked with the date and time at close of business April 30, 1995, 1997, 1999, etc.

6. Permit to Maintain Central Records

- a. With our system of separate recordkeeping for controlled substances and a document for every movement of merchandise, in or out, filed in the vault, cage, or other secured area, DEA agents may require additional records as they perform their audits. However, if suppliers' invoices and credit memos or other documents of transfer are maintained at a central location, such as the parent Distribution Center for a Rx operation or such as a Data Center, then permission for central recordkeeping must be requested and approval document, in writing from the Special-Agent-In-Charge for your Distribution Center.
- b. The letter requesting permission should be sent to your Special-Agent-In-Charge, NOT to Washington DC. The request is sent in triplicate, Certified Mail, "Return Receipt Requested."
- c. Upon receipt of the request, DEA normally sends the Distribution Center a form to fill out and return. DEA will then indicate approval on the form and return it to the Distribution Center where it should be filed permanently. The appropriate portion of the Regulations is quoted in section 1304.04-Maintenance of Records and Inventories:
  - (1) Every inventory and other records required to be kept under the Part shall be kept by the registrant and be available, for at least two years from the date of such inventory or record, for inspection and copying of authorized employee of the Administration. Financial and shipping records (such as invoices and packing slips but not executed order forms subject to 1305.13 of

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-59:SEC.VI.5

this chapter) may be kept at a central location rather than at the registered location if the registrant obtains, from the Administration, approval of his central record keeping system. A permit to keep central records shall be issued, by the Administration, to a registrant upon application if the Administration approves his central recordkeeping system and shall be subject to the following conditions:

- (a) The permit shall specify the nature of the records to be kept centrally and the exact location where the records will be kept;
- (b) The registrant agrees to deliver all or any part of such records to the registered location within 48 hours of receipt of a written request from the Administration for such records and, if the Administration chooses to do so in lieu of requiring delivery of such records to the registered location, to allow authorized employees of the Administration to inspect such records at the central location upon request by such employees without a warrant of any kind; and
- (c) The failure of the registrant to perform his agreements under permit shall revoke without further action by the Administration such permit and all other such permits held by the registrant under other registrations. In the event of a revocation of other permits under this subparagraph, the registrant shall, within 30 days after such revocation, comply with the requirements of this section that all records be kept at the registered location.

NOTE: DISTRIBUTION CENTERS MAY NOT REQUEST A PERMIT TO MAINTAIN CENTRAL RECORDS WITHOUT PRIOR APPROVAL OF THEIR VICE PRESIDENT DISTRIBUTION OPERATIONS, AND THE OPERATIONS SUPPORT AND LAW DEPARTMENTS. THE OPERATIONS SUPPORT DEPARTMENT IS RESPONSIBLE FOR MAINTAINING AN UPDATED RECORD OF SUCH CENTRAL RECORDKEEPING PERMIT NUMBERS.

CENTRAL RECORDKEEPING PERMIT NUMBER AND THE CENTRAL REPORTING IDENTIFICATION NUMBERS MUST NOT BE CONFUSED; THEY SERVE TWO COMPLETELY DIFFERENT PURPOSES. FOR INFORMATION

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-60:SEC.VI.6  
ABOUT THE CENTRAL REPORTING IDENTIFIER NUMBER. SEE PAGE  
55-114.

C. Purchase Order Records

1. Separate Purchase Orders for Schedule II

Separate purchase orders are prepared by the Buying Center for Schedule II controlled substances and, in emergencies, by the Distribution Center.

2. Separate Purchase Orders for Schedule III, IV and V

Separate purchase orders are also prepared by the Buying Center for Schedule III, IV and V controlled substances and in emergencies by the Distribution Centers.

3. New Item Controlled Substances

When a Distribution Center buys a new item, it must first determine whether the item is a controlled substance—from cost book sheets, vendor's literature, or by contacting the Profile Department, 10th floor, San Francisco, or vendor—and in what Schedule it is classified. The write-up slip must show the proper code so that the customer's invoices are correctly coded prior to receipt of Home Office maintenance. Storage space must be provided in the secured area. The Distribution Center must see that the item is written on a separate order form with other controlled substances and, if applicable, controlled by DEA Form 222 and recorded under ARCOS.

4. Automatic Receiving Records

The preparation of separate purchase orders automatically produces separate receiving records. Automatic shipment receiving records for newly controlled substances sent to the Distribution Center by the Home Office will indicate the correct schedule for the new item so that the Distribution Center can take the necessary security and recordkeeping measures.

5. Distribution Center Order Placement—Loaded Items

When emergency or special orders of loaded items must be placed by a Distribution Center, transmit a request to the Buying Center to print a confirming receiving record. The

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-61:SEC.VI.7

receiving record copy will be received at the Distribution Center within 48 hours.

6. Distribution Center Order Placement-Unloaded Items

Special orders for unloaded controlled substance items may be placed directly by a Distribution Center for any Schedule III-V controlled substance. The Distribution Center must prepare a handwritten receiving record for any such unloaded item. If the controlled substance item is ARCOS reportable, it must be loaded to the HOSS item file before receipt/billing; otherwise, a manual key-entry of all data will be required.

7. Automatic Shipment Limitations

Home Office Sales Merchandising will not authorize any automatic shipments of Schedule III-V controlled substances unless a confirming purchase order can be sent to the vendor from the Buying Center, so that the receiving record will reach the Distribution Center prior to receipt of the merchandise.

8. Controlled Substance Item Coding

Individual items will be coded as follows in the tally column:

Schedule	Code
II	X
III Narcotics	B
Other III and all IV	D
V	E

D. Receiving Records-Receipts from Vendors

In addition to the following instructions concerning the filing of receiving records, refer to the section headed, "Records Storage and Retention," beginning at page 55-56.

1. Separate Receiving Records

All receiving records for Schedule II and III-V controlled substances are separately produced on the computer. The initial check-in should be completed in the receiving area.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-62:SEC.VI.8

2. Receiving Date is Door-Entry Date

Receiving clerks must identify from the receiving records all cartons containing controlled substances and enter date of receipt on the receiving records.

3. Receiving and Shelving in the Vault

The employee authorized (cannot be same as first checker) to handle controlled substances in the cage or vault must check these items in the vault or cage and make all necessary notations on the receiving records and DEA Form 222. She or he must be sure to enter the date received and the NDC number on all 222 order forms for Schedule II controlled substances. The accuracy of all receiving information must be confirmed by the vault checker by initialing DEA Form 222.

4. Schedule II Controlled Substance Receipts

Since the primary control for Schedule II controlled substances is the official DEA Form 222, it is not necessary to hold a copy of the Schedule II receiving record in the vault.

Therefore, when the check-in has been verified for Schedule II controlled substance items, all copies of the receiving record are sent to the Inventory Manager at the close of the day.

The purchaser's copy of DEA Form 222 is used as the receiving record and is retained in the vault.

## a. NDC Code Entries:

Enter the NDC code for each item on the blank. As space is limited, do not enter leading zeros but enter exactly as printed on the bottle. Enter 55-43-12, not 00055-0043-12. Write legibly.

## b. Enter Vendor's DEA Number:

Enter the DEA number of the vendor on the copy of DEA Form 222 if not already entered. Obtain the vendor's number from the receiving record, the vendor's invoice, or the Distribution Center's list of DEA vendors.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-63:SEC.VI.9

## c. Receipt Dates:

Enter the complete month-day-year for each line item received in the "Date Received" field on Form 222. DITTO MARKS OR CONTINUOUS VERTICAL LINES ARE NOT ACCEPTABLE.

If DEA Form 222 is not received in its entirety and line items are backordered by the vendor, you must:

- (1) Photocopy original and mark the open line on the photocopy with "B/O";
- (2) File photocopy with current day's receipts; and
- (3) Carry forward original Form 222 until all line items are received. Original Form 222 document of record will be filed in the month the last "B/O" item is received. Important: Make sure that 60 days have not elapsed since the Form 222 was issued to the supplier. If merchandise for an expired Form 222 is received, contact your DEA district office for approval to receive.

## d. File DEA Form 222:

File purchaser's copy of DEA Form 222 in sequential order by date and file in the vault.

5. Schedule III ARCOS Reportable Controlled Substance Receipts

When check-in has been verified, separate the DCIM copy of the receiving record for Class III ARCOS reportable items and retain in the cage.

## a. Verify NDC Numbers:

All computer-produced receiving records for Schedule III ARCOS reportable items have the NDC code printed in the line below the item. As NDC codes are being revised, be sure the preprinted code in the receiving record is checked against the code on the item. Correct any errors. Underline codes in red when finished.

If there is a receiving record of any type for any of these items that does not show the NDC number, enter the number from the package of the item itself.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-64:SEC.VI.10

## b. Check-in Units:

If the quantity checked on the receiving record is not in selling units, be sure to change the quantity received to selling units on the copy of the receiving record being held in the cage.

## c. Filed Records:

File all receiving records in alpha sequence by day of receipt in a separate file in the cage (or other approved secured area).

6. Schedule III-V Controlled Substance Receipts

When check-in of Schedule III-V controlled substances is complete, the Distribution Center Inventory Manager's copies of the receiving records are to be filed in the cage (or other approved, secured area) in a secure file alphabetized by day of receipt within each month. (See "Records Storage and Retention" starting at page 55-56.)

7. Receiving Record Distribution by Inventory Manager

The payables copy of the receiving record is sent to the Inventory Manager. The Distribution Center Inventory Manager should make a photocopy of the receiving record if he or she wishes to retain one.

8. Backorder Procedure by Inventory Manager

- a. If the Inventory Manager knows that an omitted item is backordered by the vendor, code the item "B" on the Distribution Center copy.
- b. The computer will generate a backorder the following day.

E. Return Credits-Controlled Substance Receipts from Customers1. Procedure for the Return of Controlled Substances

- a. The McKesson driver may pick up controlled substance returns only if the merchandise can be returned immediately to the Distribution Center cage or vault upon arrival. If this cannot be accomplished, the driver must not accept the return.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-65:SEC.VI.11

Returns for controlled substances cannot be accepted by cross-dock drivers who are not domiciled out of the Distribution Center. The guidelines that must be followed are outlined below in items b. and c.

NOTE: IF, FOR SOME REASON (e.g., TRAFFIC, EQUIPMENT FAILURE, ETC.), THE DRIVER WILL NOT MAKE IT BACK TO THE DC BEFORE THE DC CLOSSES, HE/SHE MUST IMMEDIATELY CALL THE DC MANAGER. IT IS THE DC MANAGER'S RESPONSIBILITY TO MAKE ARRANGEMENTS FOR AN EXEMPT MANAGER TO REMAIN AT THE DC UNTIL THE DRIVER RETURNS WITH THE CONTROLLED SUBSTANCES.

- b. The Retail Account Manager may pick up controlled substance returns only if they will be returned directly to the Distribution Center the same day. In no instance is the merchandise to be carried in the RAM's car, dropped off at another customer's store, or stored in the garage until the next sales meeting.
- c. By Parcel Post ("Return Receipt Requested"), UPS, FedEx, or if unusually bulky, by common carrier.

Each of these methods provides our customer proof of return and proof that the controlled substance left the pharmacy.

2. Credit Memo Legibility

All credit memos for controlled substances that are not transmitted via EOE must be legible and on separate credit memos from non-controlled substances products. The complete address, account name, street address, city, state, and zip code must be entered. The customer DEA number and complete item description (including manufacturer's name if generic item) also must be entered.

3. Date of Receipt

The date of receipt at the Distribution Center must be clearly entered in the "Date Received" box on the credit memo. This is the date the goods enter the DC: the controlled substances must be immediately moved to the vault or cage on the same day received.

4. Unsalable Returns

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-66:SEC.VI.12

Unsalable as well as salable controlled substance returns are handled in the same manner as their respective schedules require in accordance with the following descriptions: returns of less than full content packages are not allowed—the only exception being a recall.

5. Schedule II Controlled Substance Returns

All returns of Schedule II controlled substances are controlled by the official order Form 222. In effect, such returns are a purchase from the customer, and the Distribution Center's copy of DEA Form 222 is to be filed in the vault.

- a. Schedule II controlled substance credit memos that are not transmitted via EOE must be legibly written on a separate four-part credit memo and be packed separately from all other merchandise.
- b. Check in all credit memos for Schedule II items on DEA Form 222 in the vault. Check the merchandise carefully.
- c. The customer's DEA registration number must be entered on the Distribution Center's copy of DEA Form 222.
- d. Enter the NDC code for the item on the purchaser's copy of DEA Form 222. Enter as printed on the bottle, e.g., 55-43-15. Do not enter leading zeros.
- e. Check in and verify receipt the same as for receipts from vendors.
- f. File by date in a separate file.

6. Schedule III ARCOS Reportable Controlled Substance Returns

All returns of Schedule III ARCOS reportable controlled substance returns that are not transmitted via EOE must be legibly written on separate, four-part credit memos. The customer's name and address must be complete, and the customer's DEA registration number must be written on the credit memo. The complete item description (including the manufacturer's name, if a generic item) for each product also must be entered.

- a. Return three copies of the credit memo to the Distribution Center with the merchandise that must be packed separately.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-67:SEC.VI.13

- b. Check in all credit memos for Schedule III controlled substance returns in the cage.
- c. When the check-in quantities have been verified, re-check to be certain that the actual date of receipt into the Distribution Center has been entered, and that the customer's DEA number is entered on the credit memo.
- d. Enter the NDC code on the credit memo for all ARCOS reportable controlled substance items. Enter as printed on the bottle, e.g., 55-43-12. Do not enter leading zeros. Underline codes in red when finished.
- e. Check in and verify receipt the same as for receipts from vendor.
- f. Detach the third copy of the credit memo and file in alpha sequence by date in a separate file in the cage.

7. Unsolicited Returns

- a. Unsolicited returns of Schedule III-V controlled substances must be documented by preparing a credit request/credit memo for the items returned. The DCM or OM must call the customer and DEA, notifying both of the action taken.
- b. Unsolicited returns of schedule II controlled substances must be documented by calling the DEA immediately. Request permission to prepare DEA Form 222 for the item returned. The DCM or OM must call the customer with notification of action taken. Attach all supporting documentation to Purchaser Copy 3 of DEA Form 222.

8. Schedule III-V Controlled Substance Returns

All returns of Schedule III-V controlled substances that are not transmitted via EOE must be legibly written on separate four-part credit memos. The customer's name and address must be complete, and the customer's DEA number and full item description (including manufacturer's name, if a generic item) must be entered on the credit memo. Three copies of the credit memos are to be returned to the Distribution Center with the merchandise that must be packed separately.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-68:SEC.VI.14

- a. Check in the merchandise carefully in the cage.
- b. Make certain the date of receipt is clearly entered on the credit memo in the "Date Received" box.
- c. Check in the unsalable merchandise in the same manner as the salable. Returns of less than full packages are not allowed. The only exception to this would be a recall.
- d. Detach and file the third copy of the credit memo in a secure file in alpha sequence, by date of receipt, by the month.

9. Distribution of Credit Memos

The remaining two copies of the credit memos for controlled substance returns are to be sent to the Adjustment Clerk after review by the Warehouse Supervisor who will scan the forms for completeness, and make certain the third copy has been detached and filed in the cage.

F. Sales and Distribution Transactions

1. Separate Sales Orders/Picking Documents

- a. Orders for Schedule II controlled substances are controlled by DEA Form 222. Orders may be transmitted, entered through CRT Order Entry, or handwritten to create picking documents.
- b. Orders for Schedule III ARCOS and III-V controlled substances are normally transmitted by the customer but can be written on separate four-part sales order/picking document forms.
- c. The customer's complete name, address and DEA registration number must always be entered on these separate handwritten sales order forms.

2. Schedule II Controlled Substance Order Filling

SEE ORDER FILLING PROCESSING. PAGE 55-85. FOR REGULATIONS THAT APPLY TO CORRECTLY COMPLETED DEA FORM 222 BEFORE AN ORDER CAN BE FILLED.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-69:SEC.VI.15

- a. ORDERS FOR SCHEDULE II CONTROLLED SUBSTANCES ARE FILLED FROM DEA FORM 222 AND NOT FROM THE SALES ORDER/PICKING DOCUMENT FORMS.
- b. Pick the merchandise and, to make sure the correct item, size, strength, and quantity has been filled, have it verified, checked, and initialed by a second employee who has authorization to handle controlled substances, against both DEA Form 222 and the pick document (or sales order form).
- c. Enter the NDC code for the item on the Distribution Center copy of DEA Form 222. Enter as printed on the bottle, e.g., 55-43-12. Do not enter leading zeros.
- d. Enter the month-day-year for each line item shipped in the "Date Shipped" column on DEA Form 222. Ditto marks or continuous vertical lines are NOT ACCEPTABLE to DEA.
- e. Do not backorder any omissions. The Code of Federal Regulations, 1305.09[b], does provide for backorders by stating: "If an order cannot be filled in its entirety, it may be filled in part and the balance supplied by additional shipments within 60 days following the date of the order form."

We have generally followed a "no backorder" policy to eliminate potential errors this procedure may create. However, with the growth of hospital and "prime vendor" business, backorders may be required and are permissible under the regulations.

(1) Best Method C-II Backorders:

- (a) The following is a suggested way to handle schedule II backorders:

- 1) Fill all the items on DEA Form 222 that can be filled. Leave the line open on the original 222 and write "backorder" on the perforated stub of the blank stock.
- 2) Place a 5 X 7 card or a self-sticking note at the location of the item that is backordered. Note the customer's name, DEA Form 222 number, and date of blank.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-70:SEC.VI.16

- 3) Make two copies of the original blank:
    - a) Put one duplicate in the daily ARCOS paper work that goes to the Computer Room with "backorder" written in the NDC number area of the line item that was backordered; and
    - b) Give the other duplicate copy to the DCIM to follow up with the vendor.
  - 4) Place the original DEA Form 222 (our copy and the DEA copy) in a "file", alphabetically by customer name, in a designated area in the vault.
  - 5) When the product arrives, retrieve the original DEA Form 222 from the backorder file for order entry. Remove the cards or self-sticking notes from the location.
  - 6) Once a week, go through the "backorder forms file" and look for blanks with dates approaching 60 days from the date the customer filled out the form.
  - 7) Follow up with DCIM on status of expected receipt date. If expected receipt date is not less than the "60 day" time frame, cancel the blank and have the customer issue a new blank.
- f. Underline in red all the fields that must be key-entered.
- g. File DEA Form 222 by date in a separate file. There is no regulatory requirement to keep the page of the picking document with the copy of DEA Form 222 since DEA Form 222 is the official record of the transaction.
3. Schedule III (ARCOS) Reportable Controlled Substance Order Filling

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-71:SEC.VI.17

Orders for Schedule III ARCOS Reportable Controlled Substances are filled from the sales order/picking document forms.

- a. Pick the merchandise and have it verified, checked, piece count noted, and initialed by an employee who has authorization to handle controlled substances before it is shipped.
- b. Enter the NDC code on the picking document for ARCOS reportable class III items only. Enter as printed on the bottle, e.g., 55-43-12. Do not enter leading zeros.
- c. Detach the special order copy of the sales order or, if a second copy is not available, make a photocopy of the sales order/pick document.
- d. File by date in a separate file.

4. Schedule III-V Controlled Substance Order Filling

- a. Detach the special order copy of the pick document or, if not available, make a photocopy of the pick document.
- b. These special order copies are the control copies and must be filed in alpha sequence, by day, in a separate file in the cage or other, approved secure location.

5. The Recommended Best Method For Dock-To-Dock Shipments

- a. Receive merchandise on a receiver.
- b. Process receiver.
- c. Prepare order using "R" code R99516. This code has no (zero) affect on sales, but subtracts from inventory.
- d. Print a pick document (this gives you the record needed to backup your ARCOS records).
- e. Pick the order and bill.

6. Date of Shipment (Transaction Date)-1304.21(d)

Section 1304.21(d) states:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-72:SEC.VI.18

"In recording dates of . . . distribution or other transfers, the date on which the controlled substances are actually . . . distributed or otherwise transferred shall be used as the date of distribution on any documents of transfer (e.g., invoices or picking documents and their copies)."

DEA holds that "the use of any date other than the actual date of distribution would be contrary to the regulations, lead to inaccurate DEA audit results, and diminish the internal control of controlled substances awaiting shipment."

DEA Form 222 is our primary record of distribution for Schedule II controlled substances, and the picking document is our primary record of distribution for Schedules III, IV, V transactions. DEA does not agree that the date a controlled substance is removed from inventory is acceptable in place of the date of actual shipping. Therefore, if controlled substances are picked on the date of order register, but not shipped until the following day, the picking document and shipping pages must be rubber date-stamped or otherwise marked with the date of actual shipment.

We believe this can best be done in the cage or vault before the order is separated. An alternative is to run the controlled substances picking documents after the day's register cut-off if they are to be shipped on the following day.

If for some reason the order is not shipped on the date entered in the "date shipped" column, draw one line through the date and enter the correct date shipped above or beside the original entry. Attach supporting documentation for the change to DEA Form 222. DO NOT WRITE OVER OR ATTEMPT TO ALTER THE ORIGINAL DATE SHIPPED.

NOTE: THE DEA HAS IMPOSED SIGNIFICANT FINES FOR WHAT WOULD APPEAR TO BE MINOR TECHNICAL DEVIATIONS FROM THIS REQUIREMENT.

7. Coding Controlled Substances-Customer Invoices/Debit Memos

The Distribution Center AS400 codes items on customer's invoices and debit memos to suppliers for returns or to other Distribution Centers for transfers of controlled substances as follows:

Schedule	Code
II	X
III Narcotics	B
Other III and all IV	D
V	E

The Home Office Business Information Services Department usually receives advance notice of new drugs being put under Federal control or shifted from one Schedule to another. The Business Information Services Department immediately advises the Director, Regulatory Affairs, of these changes so that the Distribution Centers can be notified of any necessary changes in recordkeeping and security, and coordinate with maintenance sent out by HOSS to update Distribution Center and Data Center computers. A "Profile Bulletin" will also be sent out advising everyone of these changes.

8. Adjustments-Customer Credits

NOTE: ALL CONTROLLED SUBSTANCE SHORTAGES, MISPLICKS, OR OVERAGES CALLED IN TO THE WESTLAKE, CARROLLTON, OR DROHAN CUSTOMER SERVICE HELP DESKS MUST BE REFERRED TO THE DCM WHO SERVICES THE AFFECTED CUSTOMERS. THE DC WILL HANDLE DIRECTLY WITH THE CUSTOMERS. THERE ARE TO BE NO EXCEPTIONS TO THIS PROCEDURE.

- a. All adjustments for shipping incorrect quantities or items of Schedule II controlled substances should be handled in conformity with present Distribution Center procedures. Adjustments of this sort almost never occur in a McKesson Distribution Center. Where an item is found to be shipped incorrectly, the transaction is handled like a return. DEA Form 222 is prepared and sent to the customer to buy back the item shipped in error, and a notation is made on the original DEA Form 222 of the incorrect transaction, stating what was actually shipped.
- b. All adjustment credits for Schedule III-V controlled substances must be written on separate Credit Memo forms/Return Authorizations/EOE Credit Memos.
- c. All adjustment credits that involve only an incorrect price are to be handled normally.

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-74:SEC.VI.20

- d. All adjustments for errors in order filling of Schedule III-V controlled substances should be handled in accordance with present Distribution Center procedure

Customer's sales order form indicates we shipped item "X." Customer reports he received a different item. The explanation to be written on the credit memo must state explicitly what the customer actually received. The credit must also show the date the merchandise was shipped incorrectly. When the return is received by the Distribution Center it must be taken to the cage for receipt. A copy of the credit memo must be detached and remain in the cage to be filed with that day's paperwork.

- e. Provable shortages: customer's invoice indicates we shipped a quantity of "3" each. Our picking document shows that we filled and shipped a quantity of "2" each. The explanation that a provable shortage exists must be stated explicitly on the credit memo. A copy of this credit memo must be filed in the cage with that day's paperwork.

NOTE: IF THE PROVABLE SHORTAGE IS AN ARCOS REPORTABLE ITEM, REMEMBER TO CORRECT THE ARCOS FILE FOR THE CUSTOMER ON THE DATE THAT THE TRANSACTION TOOK PLACE.

- f. Unprovable shortages: the explanation that an unprovable shortage exists must be stated explicitly on the adjustment credit. The third copy of the credit memo must be detached and sent to the cage and filed in the credit memo file. Report these shortages to DEA as:

- (1) Code T-Theft, if the shortage is a subtract from inventory; or
- (2) Code X-Lost In Transit, if the item has already been deducted from inventory.

In either case, an official theft report, DEA Form 106, must be filed with the local DEA Field Division Office. See pages 26 and 28, ARCOS General Reporting Manual.

9. Returns to Suppliers/Intra-Company Transfers

- a. Debit memos for returns of overstocks of controlled substances originated at the Drohan Data Center will be produced on the standard four-part debit memo form. If

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-75:SEC.VI.21

a vendor's permission is required to return these controlled substances, make a photocopy of the debit memo and attach it to the request for return. Do not use a copy of the computer-produced debit memo.

- b. Debit memos for returns of controlled substances originated at the Distribution Center shall be written on four-part debit memo forms and must show the supplier's or affiliated unit's complete name, address and DEA number.
- c. Control copies (goldenrod) of the debit memos in items a. and b. above must be held by the Accounting Manager, along with the Accounting copies (white) of the data center-produced debit memos, or of debit memos originated at the Distribution Center.
- d. Three registered copies of the debit memo are sent to the controlled substance cage or vault for filling.
- e. Returns of Schedule II and Schedule III ARCOS reportable controlled substances are processed the same as Sales Order/Pick Document orders for their respective schedule. Any Schedule II return must have a Form 222 completed by the supplier before filling/shipping the return.
- f. After the merchandise to be shipped has been picked, the Order Filler must enter the date picked on the debit memo, duplicating through to all copies.
- g. The Order Filler will detach the "Request for Return Authorization" copy of the Data Center-produced debit memo and the "Special Order Copy" of debit memos originated at the Distribution Center, and file them in a secure file by month.
- h. The remaining copies will be kept with the merchandise and processed in the usual way. There will be no packing copy enclosed with the merchandise unless a photocopy is taken.
- i. Computer Room invoicing of returns to vendors or transfer of overstocks must be given special attention. Since the customer number for these transactions is 888149 for all recipients, the DEA registration number does not automatically print on the invoice. The Computer Room must key-enter the recipient's DEA

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-76:SEC.VI.22

registration number as if it were a purchase order number so it will appear on the first line of the invoice. These disbursement transactions will not back-off to the end-of-day ARCOS transaction diskette. Transactions of this type must be manually keyed/inserted to the end-of-day diskette.

10. Drop-shipments-Schedule III-V ARCOS Reportable Controlled Substances

a. Schedule III ARCOS Reportable Controlled Substances:

- (1) Home Office Sales Merchandising will approve any drop-shipment arrangements for these items and will ascertain that the supplier will report the sale of these substances as a sale on DEA Form 333 to the DEA number of the customer to whom the goods are actually shipped, and not to the DEA number of the McKesson Distribution Center that bills the customer.
- (2) Do not report to the DEA any drop-shipments of controlled substances made by a vendor to your customers. The transaction must be reported by the person who actually shipped the merchandise, showing as the recipient, the person to whom the merchandise was shipped. Where you ship to one party and bill another (e.g., ship to a doctor and bill a drugstore) you must report the shipment as a sale to the doctor.
- (3) The Distribution Center that bills the customer will make no record of the transaction on DEA Form 333 but will handle and file the papers in the usual way in the accounts payable and customer invoice files.
- (4) Our purchase orders must show the supplier's DEA number, and our invoices must show the customer's DEA number.
- (5) Items on our purchase orders and invoices must be coded to indicate that they are controlled substances.

b. Other Schedule III, IV, and V Controlled Substances:

- (1) Drop-shipments of these items may be made.

- (2) Handle and file the papers in the accounts payable and customer invoice files in the usual way.
- (3) Our purchase orders must show the supplier's DEA number, and our invoices must show the customer's DEA number.
- (4) Items on our purchase orders and invoices must be coded to indicate that they are controlled substances.

c. All Schedule III-V Controlled Substances:

No papers representing drop-shipments will be filed in the cage for Schedule III-V controlled substances since the documents filed in the cage relate only to the physical movement of controlled substances into and out of our warehouse.

d. Chain Warehouse Shipments:

In some instances, controlled substances are ordered for chain warehouse requirements. Extreme care must be taken to be sure that these are not treated like drop-shipments if the order is placed by/for the Distribution Center and billed to it. The same is true for the NRTA and AARP drug warehouses.

11. Government Destruction or Seizure, Theft from Premises

- a. A debit memo must be prepared for the items seized by the government.
- b. For theft or loss of any controlled substance, a DEA Form 106 must be prepared (see Exhibit 55-11).
- c. For any destruction of a controlled substance by either a government agency or authorized by a government agency, you must have a completed DEA Form 41 (see Exhibit 55-22).
- d. Enter the NDC code for all class II and ARCOS reportable class III items. Enter as printed on the bottle, e.g., 55-43-12. Do not enter leading zeros.
- e. Be sure to enter the Distribution Center DEA number and proper designation (in place of DEA number) for person

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-78:SEC.VI.24

picking up merchandise. Use the DEA Field Division Office registration number for destroyed merchandise.

- f. Highlight all fields that must be key-entered.
- g. File debit memo by a separate file.

Occasionally a DCM is approached by an agent of a regulatory or law enforcement agency and asked to provide a Schedule II controlled substance (or a Schedule III-V) without DEA Form 222 or a letter of authorization from the Drug Enforcement Administration. Schedule II-V substances will not be supplied to any agency unless such agency provides DEA Form 222, a letter of authorization from the Drug Enforcement Administration, and a receipt for the controlled substance.

Should such a situation occur in your Distribution Center:

- Express your desire to be cooperative;
- Contact your District DEA office for approval, recording name of individual at DEA giving approval, and date and time of call; and
- Call the Law Department or Operations Support to advise them of the situation and request assistance.

In accordance with CFR 1301.26(a)(1)&(2), (b), (c), &(d), controlled substances can be released. Occurrences should be infrequent, and we are entitled to payment for product.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-79:SEC.VI.25

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-80:SEC.VII.1

VII. ORDER FORM REGULATIONS-DEA FORM 222

The material in the regulations concerning order forms is so important that all pertinent portions of these regulations are quoted in the following material.

NOTE: THE DEA HAS IMPOSED SIGNIFICANT FINES FOR FAILURE TO FILL OUT DEA FORM 222 ACCURATELY AND COMPLETELY.

A. Scope of Part 1305-1305.01

Procedures governing the issuance, use, and preservation of order forms pursuant to Section 308 of the Act (21 USC 828) are set forth generally by that section and specifically by the sections of this part.

1. Definitions-1305.02

As used in this part, the following terms shall have the meanings specified:

- a. The term "Act" means the Controlled Substances Act (84 Stat. 1242: 21 USC 801) and/or the Controlled Substances Import and Export Act (84 Stat. 1285: 21 USC 951).
- b. The term "purchaser" means any registered person entitled to prepare order forms pursuant to 1305.08.
- c. The term "supplier" means any registered person entitled to fill order forms pursuant to 1305.08.
- d. Any term not defined in this section shall have the definition set forth in section 102 of the Act (21 USC 802) and 1301.2 and 1302.2 of this chapter.

2. Distribution Requiring Order Forms-1305.03

An order form (DEA Form 222) is required for each distribution of a controlled substance listed in Schedule I or II, except for the following:

NOTE: THE EXCEPTIONS DO NOT APPLY TO MCKESSON DISTRIBUTION CENTERS.

3. Persons Entitled to Obtain and Execute Order Forms-1305.04

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-81:SEC.VII.2

- a. Order forms may be obtained only by persons who are registered under Section 303 of the Act (21 USC 823) to handle controlled substances listed in Schedules I and II, and by persons who are registered under Section 1008 of the Act (21 USC 958) to export such substances. Persons not registered to handle controlled substances listed in Schedules I or II and persons registered only to import controlled substances listed in any schedule are not entitled to obtain order forms.
- b. An order form may be executed only on behalf of the registrant named thereon and only if his registration as to the substances being purchased has not expired or been revoked or suspended.

4. Procedure for Obtaining Order Forms-1305.05

- a. Order forms are issued in books of six forms, each form containing an original, duplicate and triplicate copy (respectively, Copy 1, Copy 2, and Copy 3). A limit of three books of forms will be furnished on any requisition, unless additional books are specifically requested and a reasonable need for such additional books is shown.

Registrants who wish to obtain more than three official Order Form books at one time must obtain approval from the DEA Field Division Office serving their area, which in turn will forward the authorization to the Registration Unit at DEA Headquarters in Washington.

McKESSON NOTE: PERMISSION HAS BEEN GRANTED FOR McKESSON DISTRIBUTION CENTERS TO ORDER UP TO 40 BOOKS, ACCORDING TO USAGE, TO BE FORWARDED TO THE NATIONAL BUYING CENTER. SEE EXHIBIT 55-14 FOR CONTROL FORM TO BE USED TO ENSURE SEQUENCED USAGE.

- b. Any person applying for a registration that would entitle him/her to obtain order forms may requisition such forms by so indicating on the application form.

Order forms will be supplied upon the registration of the applicant.

Procedures for re-order are as follows:

- (1) Read the instructions on the reverse of the Purchaser's copy of the order form.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-82:SEC.VII.3

- (2) A separate requisition form, DEA Form 222a, is mailed once a month to each registrant who has received order forms in the previous 30-day period.
- (3) If a registrant does not have a DEA Form 222a, he may send a written request for more order forms to the following:

Registration Unit  
Drug Enforcement Administration  
U.S. Department of Justice  
POB 28083  
Central Station  
Washington DC 20005.

- (4) If order forms are urgently needed, the registrant may phone the DEA office at (202) 307-7255 and verbally request additional order forms.

In order to expedite requests for order forms, registrants are asked to write the words "Order Forms" in large red letters on the front and back of the envelope in which they submit their request. If order form requests can be readily identified when they are received in the Registration Unit, they can be processed faster.

- c. Each requisition shall show the name, address, and registration number of the registrant and the number of books of order forms desired. Each requisition shall be signed and dated by the same person who signed the most recent application for registration or re-registration, or by any person authorized to obtain and execute order forms by a power of attorney pursuant to 1305.07.
- d. Order forms will be serially numbered and issued with the name, address, and registration number of the registrant, and the authorized activity and schedules of the registrant. This information cannot be altered or changed by the registrant; any errors must be corrected by the Registration Unit of the Administration returning the forms with notification of the error.
- e. It is the DCM's responsibility to direct all personnel who have responsibility for opening incoming mail to

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-83:SEC.VII.4

immediately deliver correspondence from any identifiable government agency directly to the DCM or to any other exempt manager holding the DCM's power of attorney.

5. Procedure for Executing Order Forms to Purchase Controlled Substances

- a. Order forms shall be prepared and executed by the purchaser simultaneously in triplicate by means of interleaved carbon sheets that are part of the DEA Form 222. Order forms shall be prepared by use of typewriter, pen, or indelible pencil. Only one item shall be entered on each numbered line. There are ten lines on each order form. If one order form is not sufficient to include all items in an order, additional forms shall be used.
- b. There are currently two different versions of DEA Form 222 in the distribution/pharmacy network. The difference in the two forms relates to the "No. of Items Ordered" and "Last Line Completed" fields.

(1) No. of Items Ordered DEA Form 222:

The total number of items ordered shall be noted on each form in the No. of Items Ordered field (see Exhibit 55-10). If a registrant uses more than one line on DEA Form 222 to order one item, the correct entry in the No. of Items Ordered field is "1." If a registrant orders five items on DEA Form 222 and cancels one of the items, the entire order form is invalid and cannot be filled. The form must be returned to the purchaser with a written explanation regarding its return. The regulations state that a supplier cannot fill an order form that ". . . shows any alteration, erasure, or change of any description" (21 CFR 1305.11(2)). If the registrant uses two lines to order one item and enters "2" in the No. of Items Ordered field, DEA Form 222 cannot be filled and must be rejected and replaced. Further clarification of this issue was documented in writing from the DEA on February 25, 1991 and August 8, 1991 (see Exhibits 55-38a and 55-38b).

(2) Last Line Completed DEA Form 222:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-84:SEC.VII.5

For the last line completed on Form 222, the correct entry is the last line used on the order form, e.g., if seven lines are used to order one item or group of items, the correct entry in the "Last Line Completed" field is "7." Further clarification of this issue was documented in writing by the DEA on September 14, 1995 (see Exhibit 55-38c).

NOTE: ROMAN NUMERALS ARE NOT ACCEPTABLE FOR THE PURPOSE OF DESIGNATING A QUANTITY ORDERED OF ANY ITEM ON ANY LINE, OR AS AN ENTRY IN THE NO. LINES COMPLETED BOX. IF ROMAN NUMERALS ARE USED FOR DESIGNATING A QUANTITY ORDERED, THE LINE SHOULD BE OMITTED. IF A ROMAN NUMERAL IS ENTERED IN THE NO. LINES COMPLETED BOX, DEA FORM 222 IS IMPROPERLY PREPARED AND SHOULD BE REJECTED AND RETURNED TO THE REGISTRANT.

- c. An item shall consist of one or more commercial or bulk containers of the same finished or bulk form and quantity of the same substance; a separate item shall be made for each commercial or bulk container of different finished or bulk form, quantity or substance. For each item the form shall show the name of the article ordered, the finished or bulk form of the article (e.g., 10-milligram tablet, 10-milligram concentration per fluid ounce or milliliter or USP), the number of units or volume in each commercial or bulk container (e.g., 10 kilograms), the number of commercial or bulk containers ordered, and the name and quantity per unit of the controlled substance or substances contained in the article if not in pure form. The catalogue number of the article may be included at the discretion of the purchaser.
- d. The name and address of the supplier from whom the controlled substances are being ordered shall be entered on the form. Only one supplier may be listed on any one form.
- e. Each order form shall be signed and dated by a person authorized to sign a requisition for order forms on behalf of the purchaser pursuant to 1305.05(c). The name of the purchaser, if different from the individual signing the order form, shall be inserted in the signature space. Unexecuted order forms may be kept and may be executed at a location other than the registered location printed on the form, provided that all unexecuted forms are delivered promptly to the

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-85:SEC.VII.6

registered location upon an inspection of such location by any officer authorized to make inspection or to enforce any Federal, State or local law regarding controlled substances.

- f. The purchaser shall record on Copy 3 of the order form, the number of commercial or bulk containers furnished on each item and the dates on which such containers are received by the purchaser.

NOTE: DITTO MARKS AND CONTINUOUS VERTICAL LINES ARE NOT ACCEPTABLE IN THE "DATE RECEIVED" FIELD.

B. Order Filling Processing

1. Persons Entitled to Fill Order Forms-1305.08

An order form may be filled only by a person registered as a manufacturer or distributor of controlled substances listed in Schedules I or II under Section 303 of the Act (21 USC 823) or an importer of such substances under Section 1008 of the Act (21 USC 958), except for the following:

- a. A person registered to dispense such substances under section 303 of the Act, or to export such substances under section 1008 of the Act, if he is discontinuing business or if his registration is expiring without re-registration, may dispose of any controlled substances listed in Schedule I or II in his possession pursuant to order forms.
- b. A person who has obtained any controlled substance in Schedule I or II by order form may return such substance, or portion thereof, to the person from whom he obtained the substance pursuant to the order form of the latter person; and
- c. A person registered to dispense such controlled substances may distribute such controlled substances to another dispenser pursuant to, and only in the circumstances described in 1307.11 of this chapter.

2. Procedure for Executing Order Forms To Supply Controlled Substances-1305.09

- a. The purchaser shall submit Copies 1 and 2 of DEA Form 222 to the supplier, and retain Copy 3 in his own files.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-86:SEC.VII.7

NOTE: IF DEA FORM 222 IS PICKED UP BY A NON-McKESSON EMPLOYEE (e.g., COMMERCIAL/CONTRACT CARRIER) THE DEA FORM 222 MUST BE IN A SEALED ENVELOPE (SEE EXHIBIT 55-48).

- b. The supplier shall fill the order if possible and if he desires to do so, and record on Copies 1 and 2 the number of commercial and bulk containers furnished on each item, and the date on which such containers are shipped to the purchaser. If an order cannot be filled in its entirety, it may be filled in part and the balance supplied by additional shipments within 60 days following the date of the order form. No order form shall be valid more than 60 days after its execution by the purchaser, except as specified below in item e. of this section.

NOTE: DITTO MARKS AND CONTINUOUS VERTICAL LINES IN THE "DATE SHIPPED" FIELD ARE NOT ACCEPTABLE.

- c. The controlled substances shall be shipped to the purchaser at the location printed by the Administration on the order form, except as specified below in item e. of this section.
- d. The supplier shall retain Copy 1 of this order form for his own files and forward Copy 2 to the Special-Agent-In-Charge of the Drug Enforcement Administration in the area in which the supplier is located. Copy 2 shall be forwarded at the close of the month during which the order is filled: if an order is filled by partial shipments, Copy 2 shall be forwarded at the close of the month during which the final shipment is made or during which the 60-day validity period expires.
- e. Order forms submitted by registered procurement officers of the Armed Services Medical Procurement Agency for delivery to armed services establishments within the United States may be shipped to locations other than the location printed on the order form, and in partial shipments at different times not to exceed six months from the date of the order, as designated by the procurement officer when submitting the order.

3. Procedure for Acceptance of Facsimile Copies of DEA Form 222

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-87:SEC.VII.8

a. At a meeting on June 25, 1992, Joel K. Fries, Deputy Chief, Drug Operations Section, stated that it was permissible to pre-fill orders for schedule II controlled substances from facsimile copies of DEA Form 222. These procedures can be followed only if a McKesson employee driver delivers the order to the customer. Deliveries by common carrier, contract carrier, or any other agent are not permissible. Facsimile copies may be accepted for will call.

- (1) Instruct the customer to fax DEA Form 222 and retain the original copy of DEA Form 222 for pickup by delivery driver.
- (2) Upon receipt at the Distribution Center, the FAX copy of DEA Form 222 must be reviewed for accuracy, initialed, and dated by the Distribution Center Manager, other exempt managers, or a non-exempt employee designated by the DCM.

NOTE: A WRITTEN REQUEST MUST BE SUBMITTED TO AND APPROVED BY THE VPDO FOR A NON-EXEMPT EMPLOYEE TO REVIEW DEA FORM 222 FOR ACCURACY.

- (3) Make two copies of the faxed DEA Form 222 (already, approved) so that you have the form in triplicate. Retain one copy in projected original DEA Form 222 receipt date sequence. The remaining two copies should accompany the picking document.
- (4) Fill the order, enter the required shipping information, and attach one copy of the faxed DEA Form 222 to the shipping container. The remaining copy must be filed in the vault with other transactions for that date.
- (5) Prior to loading, the loader (or driver) must remove the DEA Form 222 copy from the shipping container and attach it to the customer's invoice.

NOTE: YOU MUST NOT, UNDER ANY CIRCUMSTANCES, LEAVE THE DEA FORM 222 COPY ATTACHED TO THE SHIPPING CONTAINER.

- (6) Upon receipt of the original copy of DEA Form 222 from the customer by the delivery driver, the order may be delivered. Remove the facsimile DEA Form 222 copy from the invoice. It is the delivery

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-88:SEC.VII.9

driver's responsibility to review/compare the original DEA Form 222 to the facsimile copy to ensure that the DEA Order Form numbers are the same and all other information is identical. If the original DEA Form 222 and the facsimile copy are not identical in all respects, the delivery driver must contact Distribution Management for further instruction.

- (7) The delivery driver (or line haul driver) must return the original DEA Form 222 and the facsimile copy to the Distribution Center Manager, or her or his designee.
- (8) Remove the facsimile copy from the DEA Form 222 projected receipt date file and discard it.
- (9) Send the original DEA Form 222 with the shipping facsimile copy of the form to the vault. Remove, transcribe, and replace the order filling facsimile copy with the completed copy of the original DEA Form 222. Discard the facsimile copy.
- (10) Management personnel must review the original DEA Form 222 projected receipt date file daily. Investigate all copies over three days old. For ease of follow-up, document in writing on the copy why the original DEA Form 222 is still outstanding.

NOTE: FOR DIRECTIONS ON THE USE OF FACSIMILES WHERE COMMON/CONTRACT CARRIERS ARE USED IN THE DELIVERY PROCESS, PLEASE SEE EXHIBIT 55-48.

4. Procedure for Endorsing Order Forms-1305.10

- a. An order form made out to any supplier who cannot fill all or a part of the order within the time limitation set forth in 1305.09 may be endorsed to another supplier for filling. The endorsement shall be made only by the supplier to whom the order was first made, shall state (in the spaces provided on the reverse sides of Copies 1 and 2 of the order form) the name and address of the second supplier, and shall be signed by a person authorized to obtain and execute order forms on behalf of the first supplier.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-89:SEC.VII.10

The first supplier may not fill any part of an order on an endorsed form. The second supplier shall fill the order, if possible and if he desires to do so, in conformity with 1305.09(b), (c), & (d), including shipping all substances directly to the purchaser.

- b. Distribution made on endorsed order forms shall be reported by the second supplier in the same manner as all other distributions except that, where the name of the second supplier is requested on the reporting form, the second supplier shall record the name, address, and registration number of the first supplier.

5. Unaccepted and Defective Order Forms-1305.11

DEA has issued the following guidelines for procedures regarding unaccepted and defective controlled substances order forms, DEA Form 222.

- a. Federal regulations applicable to handling of such order forms are as follows:
  - (1) No order form shall be filled if it:
    - (a) Is not complete, legible or properly prepared, executed or endorsed; or
    - (b) Shows any alteration, erasure, or change of any description.
  - (2) If an order form cannot be filled for any reason under this section, the supplier shall return Copies 1 and 2 to the purchaser with a statement of the reason (e.g., illegible or altered). A supplier may refuse for any reason to accept any order, and if a supplier refuses to accept the order, a statement that the order is not accepted shall be sufficient for the purpose of this paragraph.
  - (3) Refer to page 55-93 for sample form to use when returning unaccepted or defective order forms to a customer. Select the form most appropriate for your needs.
  - (4) When received by the purchaser, Copies 1 and 2 of the order form and the statement shall be attached to Copy 3 and retained in the files of the

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-90:SEC.VII.11

purchaser in conformity with 1305.13. A defective order form may not be corrected; it must be replaced by a new order form in order for the order to be filled.

(5) Any information that is pre-printed on the order form may not be altered in any way.

b. Pursuant to these regulations, order forms should be returned to the customer under the following circumstances:

(1) Illegibility or inability to identify customer, customer's registration number, items specified, quantities, or improper execution or endorsement.

(2) Alterations, erasures, or changes resulting in questions regarding the identity of customer, customer's registration number, items or quantities.

(3) Shows a voided or canceled line by the purchaser.

(4) Omitted signatures.

(5) 60 days have elapsed from the date of execution by the purchaser.

NOTE: THE ONLY EXCEPTION TO THIS IS WHEN THE PURCHASER HAS MISTAKENLY WRITTEN IN THE WRONG YEAR DURING THE MONTH OF JANUARY OF EACH NEW YEAR (SEE EXHIBIT 55-50 FOR DETAILED INSTRUCTIONS FROM DEA).

(6) The box showing No. of Lines Completed/Last Line Completed is blank, contains a Roman numeral, or is different than the number of items ordered/last line completed.

c. Federal order forms that identify the customer, customer's registration number, items, and quantities, and that are properly signed but are incomplete or have minor errors, may be corrected to the following extent (note of explanation attached to order forms):

(1) Filling in supplier's correct name, address, city or state when one of these have been omitted or listed incorrectly by the customer. To assure the problem is not repeated, the supplier must provide

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-91:SEC.VII.12

the purchaser with the correct address (for further clarification, see Exhibit 55-38a).

- (2) If the customer's order is correct in all respects, except that it specifies, in error, capsules and product requested is properly designated and supplied in tablets, then the order should be modified to correct "capsules" to "tablets."
- (3) Since the supplier provides the National Drug Code designation, if an error is made on the form, the supplier may correct it.
- (4) Order forms may be accepted when the customer has sent all three copies of the form to the supplier, but the customer's copy must be forwarded to him in advance of shipping the product.
- (5) Order forms received by the supplier without inter-leaf carbon may be accepted, but the supplier must insert a replacement carbon between the forms before making any entries on the form.
- (6) If a form is received listing a package amount that is unavailable, a lesser quantity may be shipped, (e.g., if order is for package size 100 and it is unavailable, supplier may ship package size 50), or if a form is received listing a package amount that is unavailable, different package sizes not to exceed the original amount may be shipped (e.g., if customer ordered 1 x 1000, supplier may ship 10 x 100).
- (7) At a meeting on June 25, 1992, the DEA stated that generic substitution was acceptable provided that the customer agrees to accept a generic rather than a brand name product, a generic product of a manufacturer other than the one specified, or a brand name product rather than a generic one (see Exhibit 55-43).
- (8) A letter from DEA further states that a distributor and its customer can enter into an advance agreement that establishes the circumstances under which the distributor may make item substitutions (Exhibit 55-52)

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-92:SEC.VII.13

- d. A single item must be canceled for the following reasons but the balance of the order may be shipped:
  - (1) If the item requested is discontinued or not listed, or is a non-controlled substance, or is a controlled substance other than a Schedule I or II controlled substance.
  - (2) Grainage is dittoed on the order form rather than designated.
  - (3) Grainage is omitted (except trademark items when the National Drug Code number is listed).
  - (4) Size of package incorrectly stated.
  - (5) Size of package omitted.
  - (6) Where a multiple item order is properly prepared and complete in all other respects, but a single item has a non-correctable defect. This item may be canceled in lieu of returning the order form to the customer.
  - (7) Roman numeral was used to indicate order quantity.
- e. The procedures listed above in no way negate the responsibility of the registrant as outlined in Section 1305 of the Code of Federal Regulations.

6. DEA Order Form Guidelines

Exhibit 55-12 provides a summary of guidelines for unaccepted and defective order forms. This sheet should be photocopied and posted in both the cage and the vault for the order filler. Also, it should be available to the person responsible for the initial review of DEA Form 222.

NOTE: ALL SCHEDULE II DEA FORM 222'S MUST BE REVIEWED AND APPROVED BY THE INITIALING OF FORM 222 BY THE DISTRIBUTION CENTER MANAGER, OTHER EXEMPT MANAGER, OR A NON-EXEMPT EMPLOYEE DESIGNATED BY THE DCM.

A WRITTEN REQUEST MUST BE SUBMITTED TO AND APPROVED BY THE VPDO FOR THE NON-EXEMPT EMPLOYEE TO REVIEW DEA FORM 222 FOR ACCURACY.

7. DEA Order Forms Example Review

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-93:SEC.VII.14

Exhibit 55-13 provides guidelines for reviewing Form 222 for accuracy. It should also be reproduced and posted as described in item 6. above.

8. Sample Form for Return of Unaccepted Order Forms (Exhibit 55-20)

Date \_\_\_\_\_

Name \_\_\_\_\_

Telephone # \_\_\_\_\_

The Drug Enforcement Administration has established specific criteria for the acceptance of Federal Order Forms, DEA Form 222. In some cases we are required to return the form to you and request a new or corrected form before shipping. In other cases we can make minor changes and process the form for shipment.

Your Federal Order Form \_\_\_\_\_ was not complete and/or correct in all respects. We have handled this as follows:

The omission and/or error indicated below is such that we are not permitted to process this form:

- \_\_\_\_\_ Form is altered.
- \_\_\_\_\_ 60 days have elapsed from date of execution.
- \_\_\_\_\_ Number in No. of Items Ordered/Last Line Completed box is blank, contains Roman numerals, or is different than number of items ordered/last line completed.
- \_\_\_\_\_ Signature omitted.
- \_\_\_\_\_ Form does not show authorization to receive both II and IIN schedules.
- \_\_\_\_\_ Registrant's address incorrectly states a P.O. Box.
- \_\_\_\_\_ Form shows a canceled or voided line by the purchaser.

If your form is being returned:

- \_\_\_\_\_ Reference our phone conversation.
- \_\_\_\_\_ Please submit a new form.
- \_\_\_\_\_ Please review attached form and return.
- \_\_\_\_\_ See example attached.

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-94:SEC.VII.15

Changes indicated below have been made, as permitted by the DEA, and your order has been shipped. This notice is for information purposes only. No action on your part is required:

- \_\_\_\_ Our name and/or address has been completed or corrected. Our correct address is (your DC address).
- \_\_\_\_ You sent all three copies to us. We are returning Copy 3 for your files.
- \_\_\_\_ We corrected the NDC # on line item #\_\_\_\_\_.
- \_\_\_\_ We modified the dosage form on line item #\_\_\_\_\_.
- \_\_\_\_ You requested \_\_\_\_\_, but the product is only supplied as \_\_\_\_\_.
- \_\_\_\_ Substitution of different size package has been made on line item #\_\_\_\_\_.
- \_\_\_\_ Line item #\_\_\_\_\_. Total product supplied is equal to or less than original request.
- \_\_\_\_ Line item #\_\_\_\_\_. No. of packages or size is omitted. We canceled this line and processed remainder of order.
- \_\_\_\_ Line item #\_\_\_\_\_. A Roman numeral was used for order quantity. We canceled this line and processed remainder of order.
- \_\_\_\_ Line item #\_\_\_\_\_ is not a Schedule II Controlled Substance. We canceled this line and processed remainder of order.
- \_\_\_\_ Line item #\_\_\_\_\_ is discontinued. It is still available in \_\_\_\_\_ NDC #\_\_\_\_\_. We canceled this line and processed remainder of order.
- \_\_\_\_ Line item #\_\_\_\_\_. Package size/product description is incomplete or incorrect. We canceled this line and processed remainder of order.
- \_\_\_\_ Line item #\_\_\_\_\_. We are currently out of inventory on this item. Per your verbal/written instructions, we have substituted this item with the comparable name brand/generic (circle one) \_\_\_\_\_ (insert item name).

Thank you for your cooperation.

9. Pro-active Customer Letter Regarding DEA Form 222 Completion

Exhibit 55-44 can be sent to your customers periodically as a pro-active reminder, or it can be included with the returned DEA Form 222 and the letter suggested for unacceptable DEA order forms above (Exhibit 55-20).

C. Power of Attorney-1305.07

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-95:SEC.VII.16

Any purchaser may authorize one or more individuals, whether or not located at the registered location of the purchaser, to obtain and execute order forms on his or her behalf by executing a power of attorney for each individual. The power of attorney shall be signed by the same person who signed (or was authorized to sign, pursuant to 1301.32(g) of this chapter or 1311.32(g) of this chapter) the most recent application for registration or re-registration and by the individual being authorized to obtain and execute order forms. The power of attorney shall be filed with the executed order forms of the purchaser, and shall be retained for the same period as any order form bearing the signature of the attorney.

The power of attorney shall be available for inspection together with other order form records.

Any power of attorney may be revoked at any time by executing a notice of revocation, signed by the person who granted (or was authorized to grant) the power of attorney, or by a successor, or whoever signed the most recent application for registration or re-registration, and filing it with the power of attorney being revoked. The form for the power of attorney and notice of revocation shall be similar to the sample form (see Exhibit 55-4).

1. Powers of Attorney Granted to Vice President Distribution Operations

- a. Powers of attorney are granted to Vice President Distribution Operations by the Drug Company President for the purpose of signing applications for registration or re-registration with the DEA.
- b. VPDO's (having been granted power of attorney) may in turn grant power of attorney to other employees to obtain and execute Order Forms. (See item 2. below.)
- c. At a meeting with Mr. Kenneth A. Durrin, former Director for Compliance and Regulatory Affairs for the DEA, in Washington on January 22, 1974, certain questions arising within our company were answered as follows:
  - Power of Attorney—The question was whether, on a change of management, a power of attorney to sign the official order form, DEA Form 222, must be revoked and a new power of attorney granted, signed by the successor management (the person

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-96:SEC.VII.17

authorized to sign applications for registration or re-registration).

The answer to the question was, "Yes." Please be sure that this instruction is followed exactly and that powers of attorney and revocations of power of attorney are properly prepared and filed with the official order form.

2. Power of Attorney Posting-1305.07

Section 1305.07 specifically provides that:

"The power of attorney shall be filed with the executed order forms of the purchaser, and shall be retained for the same period as any order form bearing the signature of the attorney."

Accordingly, all Distribution Centers shall post the power of attorney in the narcotic vault, where it will remain on display. When a power of attorney is changed, the old form is to be placed in the file containing the stored order forms for the month in which the change occurs.

3. Power of Attorney

See Exhibit 55-4 for sample form for granting power of attorney by the person authorized to grant such powers. When such a power of attorney is changed, the notice of revocation is to be completed before filing, as noted in item 2. above.

D. Lost and Stolen Order Forms-1305.12

1. Statement Required

If a purchaser ascertains that an unfilled order form has been lost, he shall execute another in triplicate and a statement, containing the serial number and date of the lost form, stating that the goods covered by the first order form were not received as a result of the loss of that order form. Copy 3 of the second form and a copy of the statement shall be retained with Copy 3 of the order form first executed. A copy of the statement shall be attached to Copies 1 and 2 of the second order form sent to the supplier. If the first order form is subsequently received by the supplier to whom it was directed, the supplier shall mark upon the face thereof, "not accepted," and return

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-97:SEC.VII.18

Copies 1 and 2 to the purchaser, who shall attach them to Copy 3 and the statement.

2. Notification to the DEA

Whenever any used or unused order forms are discovered stolen or lost (other than in the course of transmission) by any purchaser or supplier, he shall immediately upon discovery of such theft or loss report same to the:

Registration Unit  
Drug Enforcement Administration  
U.S. Department of Justice  
POB 28083  
Central Station  
Washington DC 20005.

State the serial number of each form stolen or lost. If the theft or loss includes any original order forms received from purchasers and the supplier is unable to state the serial numbers of such order forms, he shall report the date or approximate date of receipt thereof and the names and addresses of the purchasers.

If an entire book of order forms is lost or stolen, and the purchaser is unable to state the serial number of the order forms contained therein, he shall report, in lieu of the number of forms contained in such book, the date or approximate date of issuance thereof. If any unused order form reported stolen or lost is subsequently recovered or found, the Registration Unit of the Administration shall be notified immediately.

3. Control of DEA Form 222 Released to National Buying Center

When DEA Form 222's are received from the DEA, but prior to release to the National Buying Center, list the DEA Form 222 order form number sequentially on Distribution Center DEA Form 222 Control. The DCM, or his or her Attorney-In-Fact (designated by executed power of attorney), are the only individuals authorized to prepare the Distribution Center DEA Form 222 Control Form (Form 0-3085, Exhibit 55-14).

NOTE: ANY DEA FORM 222 RETAINED BY THE DC MUST ALSO BE LISTED. ANY UNEXECUTED DEA FORM 222 RETAINED BY THE DC MUST BE KEPT LOCKED UP WITH ACCESS AVAILABLE ONLY TO THE DCM, OR HER OR HIS ATTORNEY-IN-FACT (DESIGNATED BY EXECUTED POWER OF ATTORNEY).

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-98:SEC.VII.19

DEA Form 222's are to be sent to the National Buying Center by U.S. Mail Express Mail, with the box that indicates signature required checked:

National Buying Center  
POB 1308  
Arlington TX 76004.

NBC personnel will then log in these blanks on the NBC's DEA Form 222 DC control sheets. As DEA 222 forms are executed and sent to suppliers, NBC personnel will make a notation of the date the blue copy(ies) are sent to the DC on the NBC's control sheet. A copy of the sheet also will be faxed to the receiving DC, and that DC's personnel then will notify the NBC of their receipt of the DEA form 222 blue copy(ies). The DEA Form 222 blue copy(ies) will be sent by United States Postal Service Express Mail.

Upon receipt of the blue copy(ies), the DCM or her or his attorney-in-fact must match the DEA Form 222 number with the number entered on the DC DEA Form 222 Control Log (Exhibit 55-14). The vendor name and the date of receipt are to be entered on the Control Log. In the event the entire package of forms or individual blue copies within the package are not received at the DC, the NBC manager and Regional Security Manager are to be immediately contacted.

NOTE: IN THE EVENT THAT A DEA FORM 222 IS IMPROPERLY FILLED OUT AND THEN VOIDED BY THE NBC, ALL THREE COPIES OF THE FORM MUST BE RETURNED TO THE DC. THE DC MUST THEN MAKE A NOTATION ON THE LOG SHEET THAT THAT DEA FORM 222 NUMBER IS "VOID." THE VOIDED FORM 222 MUST THEN BE FILED IN THE ARCOS BOX FOR THE MONTH IN WHICH THE FORM WAS VOIDED.

E. Preservation of Order Forms-1305.13

Also see "Recordkeeping" on page 55-55.

1. Purchaser's Copy 3 Retained

The purchaser shall retain Copy 3 of each order form that has been filled. He shall also retain in his files all copies of each unaccepted or defective order form and each statement attached thereto.

2. Supplier's Copy 1 Retained

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-99:SEC.VII.20

The supplier shall retain Copy 1 of each order form that he has filled.

3. Separate Files Maintained

Order forms must be maintained separately from all other records of the registrant. Order forms are required to be kept available for inspection for a period of two years. If a purchaser has several registered locations, he must retain Copy 3 of the executed order forms and any attached statements or other related documents (not including unexecuted order forms that may be kept elsewhere pursuant to 1305.06(e) at the registered location printed on the form).

F. Return of Unused Order Forms-1305.14

If the registration of any purchaser is terminated (because the purchaser dies, ceases legal existence, discontinues business or professional practice, or changes his name or address as shown on his registration) or is suspended or revoked pursuant to 1301.45 or 1305.46 of this Chapter as to any controlled unused order forms for such substances shall be returned to the nearest Field Division Office of the Administration.

G. Cancellation and Voiding of Order Forms-1305.15

1. Purchaser's Written Notice

It is imperative that the DCIM carefully review the old-order follow-up report for Schedule II purchase orders that have not been received by their projected receipt date, and immediately follow-up with the vendor. If the projected receipt date is over 60 days from the order date, the purchase order must be canceled.

A purchaser may cancel part or all of an order form by notifying the supplier in writing of such cancellation.

The supplier shall indicate the cancellation on Copies 1 and 2 of the order form by drawing a line through the canceled items and printing "canceled" in the space provided for number of items shipped.

NOTE: THE DEA HAS IMPOSED SIGNIFICANT FINES FOR WHAT WOULD APPEAR TO BE MINOR TECHNICAL DEVIATIONS FROM THIS REQUIREMENT.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-100:SEC.VII.21

2. Supplier's Written Notice

A supplier may void part or all of an order on an order form by notifying the purchaser in writing of such voiding. The supplier shall indicate the voiding in the manner prescribed for cancellation in item 1. above.

3. Contract Rights Not Affected by Cancellation of Form

No cancellation or voiding permitted by this section shall affect in any way contract rights of either the purchaser or the supplier.

4. Expired DEA Form 222

Make sure that 60 days have not elapsed since DEA Form 222 was issued to the supplier. If merchandise for an expired DEA Form 222 is received, do the following immediately:

- a. Contact the vendor and verify the DEA order form number.
- b. Upon verification that the vendor has shipped merchandise for an expired DEA Form 222, bring this to their attention and request verification that the vendor "shipped" the order prior to the expiration of the purchaser's DEA Form 222. If the order was shipped prior to the purchaser's expiration of DEA Form 222, it is permissible to receive the order. Attach all supporting documentation to the Purchaser Copy of DEA Form 222.
- c. If the vendor shipped the order after the DEA Form 222 expired, contact the local DEA Field Office immediately for special direction on how to handle the transaction.
- d. If the DEA cannot or will not provide specific direction, contact the Distribution Operations Department (Gary Hilliard, 972-446-4614) or, in his absence, the Law Department in San Francisco (Ina Trugman 415-983-8325).
- e. Prepare and submit the "Report of Government Contact" form. (For further clarification, see Exhibit 55-39.)

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-101:SEC.VII.22

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-102:SEC.VIII.1  
VIII.COMPUTER ROOM TRANSACTIONS

Accurate reporting of all controlled substance transactions is an integral part of our commitment for full regulatory compliance. Failure to follow procedures will result in error reports from the DEA.

A. Transport Transactions to Computer Room

Documents are to be taken from the vault or cage, key-entered, verified by the Edit Program, and returned immediately to the vault or cage. Do not take documents from the vault or cage unless they are going to be key-entered.

Some Distribution Centers that have experienced difficulty in the past in accounting for all transaction records have found that daily Simplex sequence numbering of all records released to the Computer Room helps ensure their return.

B. Weekly/Daily Key-entry

1. Keep Key-entry Current

Transactions are to be key-entered weekly, except for the last five days of the month when they are to be key-entered daily. Many Distribution Centers find it desirable to key-enter transactions on a daily or semi-weekly basis throughout the entire month for easier end-of-month reconciliation.

2. Transmittal Letter-Separated Transactions

All transactions are to be sent to the Computer Room separated by type of transaction and by class. Sort transactions as follows:

- a. Receipts from vendors-Class II and Class III.
- b. Credit memos from customers-Class II and Class III.
- c. Returns to vendors-Class II and Class III.
- d. Sales to customers-Class II and Class III.
- e. Government seizure and destruction.

3. Transmittal Letter Entries (Exhibit 55-15)

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-103:SEC.VIII.2

Fill in letter of transmittal as follows:

- a. Enter Distribution Center number.
- b. Enter date released to the Computer Room.
- c. Enter the number of entries for each code and the total number of pieces to be key-entered for each code.
- d. Be sure that the source documents are sent to key-entry separated by transaction codes.

4. Transaction Codes to be Used

Transaction codes to be used are determined following rules below:

"P"—Purchase from vendor or returns from customers.

"R"—Shipment refused by vendor or customer: If Schedule II, enter order form number under which product was originally shipped.

"X"—Losses in transit and unprovable shortages: These transactions must be reported under code "X" even if no credit memo is issued. The "X" code does not reduce inventory balances.

"S"—Sales to customers, returns to vendors, transfer to other McKesson units.

"T"— Theft of controlled substances from the premises.

"Y"— Destruction of merchandise: Be sure to include the Proof Of Destruction DEA Form 41.

"Z"— Government seizure: Ask Government Agent what Registrant number should be entered in Field 7. For state and local officers who do not have a number, enter the word "OFFICER".

"G"— Recovery of merchandise previously reported stolen.

"V"— Unsolicited Returns: Merchandise received without identification as to where it came from.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-104:SEC.VIII.3

NOTE: THE DCM MUST NOTIFY HER OR HIS VICE PRESIDENT DISTRIBUTION OPERATIONS WHENEVER THIS TRANSACTION CODE IS USED.

Also be sure to complete DEA Form 106 for "X" and "T" transaction codes.

5. Key-enter and Edit Transactions

a. Computer Room key-enters as follows:

- (1) CC1-9: Distribution Center DEA number
- (2) CC10: transaction code
- (3) CC12-22: NDC code for the item. Break down of fields is 5-4-2. Enter leading zeros as necessary to any field.
- (4) 23-30: enter beginning inventory, ending inventory, or transaction quantity. Enter leading zeros if necessary.
- (5) 32-40: enter the customer or vendor DEA number. Leave blank for inventory balances.
- (6) 41-49: enter the DEA Form 222 number for Schedule II items. Leave blank for Schedule III items.
- (7) 50-55: enter the transaction date. First two positions for month, second two for day, last two for year. Enter leading zeros, if necessary, to any field.

b. ARCOS Edit Listing Program

- (1) Each Distribution Center will have a separate disk file to verify the accuracy of transaction codes, NDC codes, and registrant DEA numbers.
- (2) Computer Room runs the ARCOS diskette through the Edit Program immediately after key-entry. Program verifies the following fields:
  - (a) Distribution Center DEA number
  - (b) Transaction Code—that it is a valid entry.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-105:SEC.VIII.4

- (c) NDC Code—that it matches an NDC code on the file.
  - (d) Quantity—that field is filled in completely and is all numeric.
  - (e) Customer DEA Number—that it is a valid number carried on the file. The Distribution Center DEA number is not a valid number for this field.
  - (f) That the blank number is filled in for all items coded "X." Also that the field has alpha followed by eight numeric entries.
  - (g) That the transaction date used is for the month being reported and is a valid date within the month.
  - (h) Also determines that CC11, 31, and 56-80 are blank at this time.
- (3) Any field in error will have asterisks printed under it. Also, each transaction code has a subtotal of number of records and quantity key-entered, and grand total of all codes is listed at the end of edit.
  - (4) All sales transactions print in ascending invoice sequence. Rerun edit with corrected entries on diskette until the edit run is clear of all errors. Be sure that the last totals agree with the entries on the transmittal sheet.
  - (5) File diskette as a batch for the end of the month ARCOS Report.
  - (6) Edit program is run for every batch sent to key-entry during the month.

C. Producing Month-End ARCOS Report

1. Balancing Due 8th Workday/Following Month

- a. Transactions are keyed to diskette daily or weekly during the month by the Distribution Center:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-106:SEC.VIII.5

- (1) Input edited locally using program DU40DJI and corrections made.
  - (2) Input transmitted to DPC after corrections made using DUL3JI.
  - (3) DDC edit input. Advises Distribution Center of errors.
  - (4) Distribution Center corrects error using Program DU03JI.
- b. When all transactions for the month, including physical inventory counts, have been transmitted, and errors found by edit programs corrected, monthly balancing is done. Balancing must be completed by the 8th workday of the month.
- c. Sequence of month-end work:
- (1) Run monthly edit and balance Program DU04J6:
    - (a) Program pre-edits for format errors.
    - (b) Correct errors using Program DU03J1.
    - (c) Rerun Program DU04J6 after corrections.
  - (2) After corrections DU04J6:
    - (a) Adds previous month-end inventory.
    - (b) Sorts file into NDC number sequence.
    - (c) Assigns government sequence number to each transaction.
    - (d) Performs a balancing edit.
  - (3) Report from DU04J6:
    - (a) Totals all transactions for an NDC code.
    - (b) Flags any item not in balance.

2. Error Correction Routine

- a. Check for any batch entry errors. NDC codes are edited for validity only. It is still possible to have copied an incorrect code. Clue is a disbursement or receipt entry only without any other entries.
- b. Summarize balance of errors. List Label Code, NDC Code, item description, receipts, issues, beginning and

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-107:SEC.VIII.6

ending inventory. Then reconstruct all transactions for these items using the source documents for all transactions that are kept in the vault and cage.

- c. The DCM's designee will review the DU04 ARCOS Month-end Transmission Edit Reports, research, and create an error correction form for each correction needed. The error correction forms must be sequentially numbered, with the same sequence noted on the DU04 report, and contain a complete explanation for the correction (Exhibit 55-23).
- d. The Computer Room must be instructed to input Error Corrections only from forms that are properly completed and approved and signed by the DCM. In the event the DCM is unavailable for legitimate reasons, the DCM's designee may approve and sign error correction forms for submission to the Computer Room. Upon the availability/return of the DCM, it is his or her responsibility to review and sign the submitted error correction forms.
- e. The edit listing is to be run until all differences are "zero."
- f. Distribution Center must do the following:
  - (1) Research all errors and correct.
  - (2) Transmit corrections using DU03J1.
  - (3) Rerun DU04J6 until all items balance.
  - (4) Have DCAM run adding machine tape of count totals directly from inventory count sheets, and compare to the piece totals on DU04J6. THE TWO TOTALS MUST AGREE. If not, DU04J6 will be returned for further reconciliation.
- g. Create DEA file.
  - (1) DU04J6 creates a file at DDC of all transactions to be included in the monthly tape sent to Washington when edit is error free and items balanced.
  - (2) DDC combines clean files of Distribution Centers on tape and send to DEA in Washington.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-108:SEC.VIII.7

h. Distribution Center Manager Override

- (1) If the Distribution Center is unable to balance by the 8th workday of the month, the Distribution Center Manager may decide to submit the monthly report unbalanced. The DC's VPDO must be advised of this situation prior to the override option being used and follow up in writing (Exhibit 55-49).
- (2) Instructions for use of this override option are in Program DU04J6.

3. Elimination of Non-Reportable Items

If you have incorrectly reported to ARCOS an item that you find non-reportable, simply stop reporting the item. The ARCOS computers do not recognize items incorrectly classified as reportable. If you discover that error yourself, also advise the Merchandise Profile Department in San Francisco so that any error in the Home Office computer file can be corrected and maintenance sent to the Distribution Centers.

4. File ARCOS Report

- a. The final edit listing transmitted back to the Distribution Center and the pre-balance error corrections must be reviewed and signed by the DCM and filed with the month-end ARCOS records.

NOTE: ALL PRE-BALANCE REPORTS AND ERROR CORRECTIONS MUST BE FILED SEPARATELY FROM OFFICIAL RECORDS IN YOUR DC ARCOS GENERAL FILE FOR A ROLLING THREE MONTHS.

- b. The Drohan Data Center Manager will follow up at the close of each month with a report indicating when the information for submission of the ARCOS report was received along with comments on events that might have occurred during that time at the various units. This report is forwarded monthly to Home Office Distribution Operations department for review, and then to the VPDO and RDM. A copy of this report is attached for your information (see Exhibit 55-16).

D. DEA Error Reports

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-109:SEC.VIII.8

In making corrections it is essential that only DEA Form 333 OCR (2/81) be used. No other form is acceptable. Also, when making a correction, start with the first error and record all the correction information first from the edit, and then enter the corrected field. Use a #2 indelible pencil for entering corrections using the print style shown on DEA Form 333 OCR (2/81) (see Exhibit 55-17).

1. Error Notices—Two Types from DEA

Distribution Centers receive two types of error notices from DEA:

- a. Transaction errors such as an incorrect entry, or wrong DEA or NDC codes. These will be noted and sent out to registrants with a request that they submit correcting transactions.
- b. Discrepancy notices. These cover inventory errors as listed in the ARCOS General Reporting Information Manual.

2. ARCOS Edit Error Listing from DEA (Exhibit 55-18)

- a. Immediately on receipt of the ARCOS batch control and transaction edit errors listing, the Distribution Center must complete DEA Form 333 (2-81) to correct the errors, and to mail as Certified Mail, "Return Receipt Requested," as soon as possible to:

DEA ARCOS Unit  
POB 28293  
Central Station  
Washington DC 20005.

(DEA Form 333 is shown as Exhibit 55-17.)

- b. The ARCOS batch control and transaction edit error listing is an exact print of DEA Form 333. Some of the fields run together and are difficult to read. It is suggested that the report be ruled off by fields and the field headers written on the report before starting the correction routine.
- c. Complete DEA Form 333 in duplicate, one copy for DEA and one for Distribution Center records. Fill in header as follows:

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-110:SEC.VIII.9

- (1) Enter submitting registration number.
- (2) Enter the period covered by this report. The dates are determined by the errors listed on the report. Beginning date is the date of the earliest transaction with an error on the list and the ending date is the date of the latest transaction for that month with an error. If errors are listed for 10/7, 10/10, 10/11, 10/18 and 10/25 the beginning date is 10/7 and the ending date 10/25.

Only corrections for one month can be submitted together. If for some reason more than one month's corrections are being forwarded, a separate report for each month must be prepared and submitted.

- (3) Enter page number.

3. Error Type Check on Error Listing

Check the ARCOS error listing for the type of error found by DEA.

a. Invalid Associate Register Number code E-48:

- (1) Determine transaction date and type.
- (2) Find the source document from which the input was key-entered. Use the NDC code and Associate DEA number to determine the correct document.
- (3) Obtain the customer's correct DEA number from the Distribution Center permanent file. If incorrect on file, obtain proper number from the customer at once. Correct the Distribution Center file immediately by file maintenance.
- (4) Write up the correcting entry on DEA Form 333. Copy the information for Fields 1, 2, 4, 5, 8 (if Class II), and 10-13 from the ARCOS Edit Listing. Enter the customer's correct DEA number in Field #7. If this is the first error correction on the month's report, the correct transaction identifier number follows in sequence the last transaction identifier found on the last page of the final month-end ARCOS Report.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-111:SEC.VIII.10

- (5) The same correction procedure is used to correct invalid associate number for all types of transactions.
- b. NDC Code Not on File—Code E 76:
- (1) Determine transaction date and type.
  - (2) Find the source document from which the input was entered. Use the customer DEA number and incorrect NDC code to determine the source document.
  - (3) Check file to determine correct NDC code. If possible, also check any merchandise left on shelf to obtain proper NDC code. If file has same number as DEA Form 333 and no merchandise is on hand, call vendor (or vendor representative) for the code.
  - (4) Write up the correcting entry on DEA Form 333. Copy the information for Fields 1, 2, 5, 7, 8, and 10-13 from the ARCOS Edit Listing. Enter the correct NDC code in Field #4. If this is the second correction for this month's report, the transaction identifier number follows in sequence the transaction identifier listed first on DEA Form 333.
  - (5) If NDC code returned as an error by DEA is the code on the bottle, re-enter this code on the DEA Form 333 and note this fact on the form.
- c. Duplicate Transactions—Code 20:
- (1) All transactions on the computer tape are sequentially numbered by program D404J6.
  - (2) If error does occur, re-enter on DEA Form 333. If this is the third correction for this month's report, the transaction identifier follows in sequence the transaction identifier listed second on the DEA Form 333.
- d. Other types of errors are possible. However, if the edit program is run and all errors corrected, they will not appear on the ARCOS Transaction Error Report. Complete list of error messages is contained in the ARCOS General Reporting Information Manual.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-112:SEC.VIII.11

4. ARCOS Discrepancy Report Corrections

ARCOS Discrepancy Reports must be corrected through the monthly "333" report. Discrepancy Reports cover inventory errors, e.g., sold more than reported to DEA as in inventory.

- a. As soon as a discrepancy notice is received it must be checked out immediately and corrected. Use the source documents stored in the vault/cage to determine the error. Be sure to track the error to completion and make all necessary corrections.
- b. Key-enter the error corrections as follows:
  - (1) The transaction code in CC11 is "D" for delete. Use the original date and transaction identifier for this entry. The date and transaction identifier out of sequence will be accepted by DEA due to the "D" in CC11.
  - (2) If a correcting entry must be made, it must follow this entry. Enter in standard format using the original date and new sequential transaction identifier.
- c. Remember, correcting one error may require another entry to advise DEA of the actual item shipped.
- d. Complete instructions on these corrections are contained in DEA's ARCOS General Reporting Information Manual. To obtain a copy, see page 55-7.

E. File Set-Up for ARCOS Edit Program1. Set-Up Prior to Monthly Processing

The file for the ARCOS Edit program is to be set up prior to monthly processing.

- a. Input to the ARCOS Edit program will be:
  - (1) NDC codes for all ARCOS reportable items taken from Distribution Center EPIC Billing File by Program DU20DJ0.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-113:SEC.VIII.12

- (2) DEA numbers for all customers. Take from the Distribution Center Customer File by Program DU20DJO.
- (3) DEA numbers for all vendors. Take from the Distribution Center Sales History.
- b. Key-enter input for local file maintenance as follows:
  - (1) Items:
    - (a) CC 1-6-Label Code.
    - (b) CC 32-42-NDC Number.
    - (c) CC 56-"X" or "B."
    - (d) CC 80-3.
  - (2) Customer DEA number:
    - (a) CC 1="7."
    - (b) CC 2-7-Customer Number.
    - (c) CC 47-55-Customer/DEA Number.
  - (3) Vendor DEA Number:
    - (a) CC 1-7.
    - (b) CC 2-7=Vendor number (add leading zero).
    - (c) CC 8=S.
    - (d) CC 47-55=Vendor DEA Number.
- c. As new items falling under ARCOS control are added to the vault/cage, the NDC code must be added to the file. If it is also from a new vendor, the vendor DEA number must be added to the file.
- d. If an NDC code is being changed by a vendor, both NDC codes must be on file when merchandise bearing both codes is in stock:
  - (1) Place an Epic Label with the NDC code written on it on the shelf for each NDC code. Mark the shelf label of the NDC code that is to be sold first.
  - (2) When merchandise with old NDC code is sold out, destroy the EPIC Label with the old NDC code and delete the NDC code from the file.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-114:SEC.VIII.13

- e. As new customers are added, be sure to add their DEA numbers to the file. When customers are dropped, be sure their DEA numbers are deleted from the file.
- f. When items are dropped from the Distribution Center inventory, the NDC code should be deleted from the file. Credits from customers should not be accepted unless the item and NDC code are active on the Distribution Center file.

F. Central Reporting Identifier Number

McKesson's assigned Central Reporting Identifier number is 030. This number is used only by the Drohan Data Center to identify the three monthly tapes transmitted to DEA ARCOS Section in Washington—tapes that are batched by Drug Company Area groupings. Exhibits 55-19 and 55-21 refer to this identifier number.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE55-115:SEC.VIII.14

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-116:SEC.IX.1

IX. MISCELLANEOUS TOPICS

A. Disposal of Controlled Substances

Any Distribution Center wishing to dispose of controlled substances may request the Special-Agent-In-Charge of the Area for authority and instructions to dispose of such substance. Make the request as follows:

1. List ARCOS reportable controlled substance to be disposed of on the 'b' subpart of the report normally filed (DEA Form 41) and submit three copies of that subpart to the Special-Agent-In-Charge of the Distribution Center's area, and/or
2. List the controlled substances that are non-ARCOS reportable on DEA Form 41 (see Exhibit 55-22) and submit three copies to the Special-Agent-In-Charge.

The Special-Agent-In-Charge will instruct and authorize the applicant to dispose of the controlled substance in one of the following manners:

- a. By transfer to person registered under the Act and authorized to process the substance;
- b. By delivery to an agent of the Administration, or to the nearest Field Division office of the Administration;
- c. By destruction in the presence of an agent of the Administration or other authorized person; or
- d. By such other means as the Administrator may determine to assure that the substance does not become available to unauthorized persons.

In the event that a registrant is required regularly to dispose of controlled substances, the Special-Agent-In-Charge may authorize the registrant to dispose of such substances in conformity with the above methods, without prior approval of the Administration in each instance on condition that the registrant keep records of such disposals and file periodic reports with the Special-Agent-In-Charge summarizing the disposals made.

Such authority may be requested in writing to the Special-Agent-In-Charge. If such permission is granted, the

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-117:SEC.IX.2

method of destruction and the name and title of the individuals witnessing the destruction of the controlled substances must be recorded on DEA Form 41.

Upon completion of the destruction, two copies of the forms are to be sent to the Special-Agent-In-Charge, and the original copies retained with the controlled substance records.

B. Breakage Reports

Documentation of breakage occurring in the vault or cage is required by the DEA. Breakage that occurs in the vault or cage should be written up and documented using one of the following label codes:

1. R88501-Breakage; or
2. R88485-Inventory Decrease.

Retain one copy in the monthly DEA file.

The broken merchandise is to be held for disposal as outlined in item A. above.

Concern will arise when the same item is broken repeatedly.

Use of this form does not change the standard breakage report procedures.

C. Losses

1. Loss by Burglary, Holdup, Theft, or Loss in Transit

a. Immediately notify your:

- (1) Vice President Distribution Operations;
- (2) Regional Security Manager;
- (3) Home Office Law Department;
- (4) Field Division Office of DEA; and
- (5) Local Police.

- b. Obtain DEA Form 106 from the nearest Field Division Office of DEA. List to the best of your knowledge and ability and return completed DEA Form 106 to the Field Division Office of DEA.

NOTE: IT IS IMPERATIVE THAT NOTIFICATION BE MADE IMMEDIATELY TO ALL PARTIES LISTED. DO NOT ATTEMPT TO RESEARCH AND

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-118:SEC.IX.3

RECONCILE THE LOSS AND FILE DEA FORM 106 AT A LATER DATE. AN ADDENDUM TO DEA FORM 106 MAY BE SUBMITTED UPON COMPLETION OF YOUR INVESTIGATION.

- c. If ARCOS reportable, enter the NDC Code on the copy of the debit memo used to write off the loss. Note on the debit memo the transaction code is "T." Process in normal manner with all other ARCOS reportable transactions.

2. Losses in Transit-Outgoing Shipments

- a. Advise the Field Division Office of DEA on the official theft report, DEA Form 106.
- b. If ARCOS reportable and the loss is detected in the current month, input an additional transaction for each item lost in transit, using an "X" transaction code. Do not replace the original "S" transaction with an "X." If the loss is detected in a future month, fill out DEA Form 333, deleting the original transaction and resubmitting the original transaction with the "X" code.

3. Losses in Transit-Inbound Shipments

- a. Notify the supplier immediately by phone and confirm in writing.
- b. Notify your Vice President Distribution Operations and Regional Security Manager immediately.

4. The Regulation Covering Losses-1301.74(c)

The registrant shall notify the Field Division Office of the Administration in his area of any theft or significant loss of any controlled substances upon discovery of such theft or loss. The supplier shall be responsible for reporting in-transit losses of controlled substances by the common or contract carrier selected pursuant to 1301.74(e) upon discovery of such theft or loss. The registrant shall also complete DEA Form 106 regarding such theft or loss. Thefts must be reported whether or not the controlled substances are subsequently recovered and/or the responsible parties are identified and action taken against them.

D. Selection of Carriers-1301.74(e)

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-119:SEC.IX.4

When shipping controlled substances, a registrant is responsible for selecting common or contract carriers that provide adequate security to guard against in-transit losses. When storing controlled substances in a public warehouse, a registrant is responsible for selecting a warehouse that will provide adequate security to guard against storage losses; wherever possible, the registrant shall store controlled substances in a public warehouse that complies with the requirements set forth in 1301.72. In addition, the registrant shall employ precautions to guard against storage or in-transit losses, e.g., assuring that shipping containers do not indicate that contents are controlled substances.

E. Discontinuance or Transfer of Business-1307.14

The regulation covering the situation is quoted below:

1. Any registrant desiring to discontinue business activities altogether or with respect to controlled substances (without transferring such business activities to another person) shall return for cancellation his certificate of registration, and any unexecuted order forms in his possession, to the Registration Unit, Drug Enforcement Administration, Department of Justice, POB 28083, Central Station, Washington DC 20005. Any controlled substances in his possession may be disposed of in accordance with 1307.21.
2. Any registrant desiring to discontinue business activities altogether or with respect to controlled substances (by transferring such business activities to another person) shall submit in person or by Registered or Certified Mail, "Return Receipt Requested," to the Special-Agent-In-Charge in his area at least 14 days in advance of the date of the proposed transfer (unless the Special-Agent-In-Charge waives this time limitation in individual instances), the following information:
  - a. The name, address, registration number, and authorized business activity of the registrant discontinuing the business (registrant-transferor);
  - b. The name, address, registration number and authorized business activity of the person acquiring the business (registrant-transferee);
  - c. Whether the business activities will be continued at the location registered by the person discontinuing

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-120:SEC.IX.5

business, or moved to another location (if the latter, the address of the new location should be listed);

- d. Whether the registrant-transferor has a quota to manufacture or produce any controlled substance listed in Schedule I or II (if so, the basic class or class of substance should be indicated); and
  - e. The date on which the transfer of controlled substances will occur.
3. Unless the registrant-transferor is informed by the Special-Agent-In-Charge before the date on which the transfer was stated to occur that the transfer may not occur, the registrant-transferor may distribute (without being registered to distribute) controlled substances in his possession to the registrant-transferee in accordance with the following:
- a. On the date of transfer of the controlled substance, a complete inventory of all controlled substances being transferred shall be taken in accordance with 1304.11-1304.19 of this chapter. This inventory shall serve as the final inventory of the registrant-transferor, and a copy of the inventory shall be included in the records of each person. It shall not be necessary to file a copy of the inventory with the Administration unless requested by the Special-Agent-In-Charge. Transfers of any substance listed in Schedule I or II shall require the use of order forms in conformity with Part 1305 of this chapter.
  - b. On the date of transfer of the controlled substances, all records required to be kept by the registrant-transferor with reference to the controlled substances being transferred, under Part 1304 of this chapter, shall be transferred to the registrant-transferee. Responsibility for the accuracy of records prior to the date of transfer remains with the transferor, but responsibility for custody and maintenance shall be upon the transferee.
  - c. In the case of registrants required to make reports pursuant to Part 1304 of this chapter, a report marked "Final" will be prepared and submitted by the registrant-transferor showing the description of all the controlled substances for which a report is

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-121:SEC.IX.6

required; no additional report will be required from him if no further transactions involving controlled substances are consummated by him. The initial report of the registrant-transferee shall account for transactions beginning with the day next succeeding the date of discontinuance or transfer of business by the registrant-transferor, and the substances transferred to him shall be reported as receipts in his initial report.

F. U.S. Postal Mailing Limitations

Amendments to the U.S. Postal Regulations announced in the Federal Register, February 10, 1975, establish limitations on mailing quantities of DEA controlled substances as follows:

1. From Registrant to Registrant

Controlled substances including Schedule II may be sent in any quantity by Registered Mail, "Return Receipt Requested," from one DEA registrant to another DEA registrant. The packaging must be in plain outer containers and give no indication of the contents.

2. From Registrant to Non-Registrant, e.g., registered retail drug store to consumer

a. Non-narcotic controlled substances listed in Schedule II may be sent by regular mail in quantities not exceeding 100 dosage units.

b. Non-narcotic controlled substances listed in Schedule III, IV, and V may be sent by regular mail in amounts not exceeding a 100-day supply or 300 dosage units, whichever is less.

G. NDC Number Change

The procedures necessary to ensure a smooth transition from old NDC number to new are listed below (see Exhibit 55-41):

1. Receiving

There should be no change in receiving procedures.

Double check to be sure the NDC number on the product being received matches the NDC number printed on the receiving

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-122:SEC.IX.7

record. If they are different, change the receiving record to that of the NDC number on the product.

2. Stock Put-away

When merchandise is shelved it must be kept separately from merchandise with an NDC number that is different. That is to say, it can be placed under the same item/shelf label code but some notification must be placed on or near this merchandise to alert the picker to use the old NDC number merchandise first.

3. Daily Edit ARCOS

When you submit your receiving records to the Computer Room to update your IBIS inventory file, your ARCOS file will also need to be updated. Because of the NDC number change you will have to load the new NDC number to the DU40 Local Edit File (DAMARCO).

4. Pick Procedure

There should be no change in pick procedure, however, it is not uncommon for the picker to pick from memory and also to write NDC numbers from memory. This is not proper, and the picker should be reminded to enter the NDC number from the package onto the picking document. This will ensure an accurate ARCOS edit at month-end.

5. Month-End Physical Inventory

Count both old and new NDC numbers of the product, until inventory of the old NDC number is exhausted. (This includes reclamation center items pending authorized destruction.)

H. Handling Schedule II Controlled Substance Sales to Doctors When Billing Hospital or Retail Account

NOTE: THERE ARE TWO PROCEDURES THAT MUST BE FOLLOWED WHEN HANDLING THESE TYPES OF ORDERS:

- YOU MUST HAVE A COPY, ON FILE, OF THE DOCTOR'S DEA REGISTRATION TO FILL HIS OR HER ORDER; AND
- YOU MUST DELIVER TO THE ADDRESS ON THE BLANK.

1. DEA Form 222 must be reviewed and initialed, verifying accuracy of the blank entries.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-123:SEC.IX.8

2. Enter, via CRT override, the customer name, address, city (route and stop number if necessary) with doctor's name, address, etc.
3. Place a message line (CMD-3) stating "Change Customer DEA number on daily edit to "(Doctor's DEA #)."
4. Follow normal procedures for filling and shipping the Class II orders.

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-124:SEC.IX.9

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-125:SEC.X.1

X. DEA AUDITSA. By DEA Personnel

Agents of DEA will visit your Distribution Center to make accountability audits on a normal three-year cycle. They will check the adequacy of the physical and electronic protection afforded controlled substances and all transactions and records pertinent to handling controlled substances. To discover discrepancies, the agents will use the following methods for whichever items they select for audit:

Beginning Inventory	From DEA biennial April 30 inventory or your accounting physical inventory or possibly your December 31 ARCOS inventory for ARCOS reportable items.
Receipts	From your records of receipts.
Total Accountability	Beginning inventory plus receipts.
Disbursements	From your records of disbursements.
Closing Inventories	Taken by the DEA agents when they begin their audit.
Total Accounted For	Disbursements plus closing inventory.
Difference	Over or short.

1. Beginning of Audit

At the beginning of the DEA audit, make a copy of the DEA Inspection Report and the Report of Government Contact form (see Exhibit 55-34, pages 1 & 2, and Exhibit 55-39). In an effort to more closely monitor our compliance performance, please make sure all statistics are recorded and documented as requested on the DEA Inspection Report. When the report is filled out completely, send a copy to the Operations Support Department, 28th floor, San Francisco.

2. Accurate Beginning Inventories

Beginning inventories are either our accounting physical inventories, the biennial April 30 controlled substances inventories, the December 31 annual ARCOS inventories, or the initial inventory of stocked items reclassified as controlled substances.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-126:SEC.X.2

NOTE: ALL INVENTORIES MUST BE IDENTIFIED AS HAVING BEEN TAKEN AT EITHER THE CLOSE OF BUSINESS OR BEGINNING OF BUSINESS FOR A PARTICULAR DAY.

3. Accurate Ending Inventories

DEA agents will take their own count of the items they select to audit. Urge the agents to take the count when all receipts and disbursements for the day are completed and the paper work finished. Otherwise it will be impossible to achieve a balance. Take your own count of the same items with the agents or as soon as they have finished and before any further receipts or disbursements are processed. Maintain record of your counts. If the agents will permit it, it would be wise to compare your counts with theirs to reconcile any differences so both of you are in agreement on the audit "closing" inventory.

4. Complete Records in Order and Available

Make sure all records of receipts and disbursements filed in the vault or cage (or in a locked file in the office for older records) for the period being audited are in order and in the prescribed sequence.

5. Adjustment Credits

Make sure that the agents understand the explanations on each credit memo and make the proper adjustments to their transaction records.

6. Parallel Audit

The Distribution Center shall conduct a parallel audit of the items being checked by DEA agents.

7. End of Audit-Review Notes

At the end of the compliance inspection, while DEA is not required by law to do so, it is customary for the Agent-In-Charge to review the findings with the Distribution Center Manager. If the DEA agent does not, as a matter of course, conduct an exit interview after your inspection, you should request in writing (with prior review and approval by the Law department) a meeting for this purpose. It should be explained to the inspector that your facility wants to be able to take any necessary corrective action as soon as possible and that an exit interview could permit such action

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-127:SEC.X.3

to be taken much sooner. Ask for an explanation of the findings and the supporting documentation. Careful notes should be taken and any deficiencies or discrepancies that can be corrected while the agents are there should be corrected. Those deficiencies that cannot be corrected while the DEA agents are present must be reconstructed to verify their accuracy. If deficiencies are confirmed, correct them immediately and document action taken and submit to the DEA. Upon completion of the compliance inspection, prepare and submit the "Report of Government Contact." A second follow-up report is required to advise of completion of the audit and the findings reported by the DEA during the audit and/or the exit interview. A follow-up letter (with prior review and approval by the Law department) should also be sent to the compliance investigator conducting the exit interview or the Agent-In-Charge confirming the comments made during the course of the exit interview. The DEA inspection report (see Exhibit 55-34) must then be completed in its entirety and mailed to the Operations Support Department (28th Floor, San Francisco), Law Department, and Vice President Distribution Operations.

8. Law Department Review before Response to DEA

Subsequent to this review, a letter may be received from DEA detailing their findings resulting from the audit. This letter may require a response by the Distribution Center Manager. When the response has been drafted, and before being mailed to DEA, it must be sent to the Operations Support Department (28th Floor, San Francisco), Law Department, and Vice President Distribution Operations for review. Once an approval or a modified draft by the Law Department has been received, it can be sent to DEA.

NOTE: ALL WRITTEN CORRESPONDENCE TO THE DEA MUST BE SENT CERTIFIED MAIL. "RETURN RECEIPT REQUESTED."

B. Distribution Center-Quarterly DEA Checklist

NOTE: THIS IS PROPRIETARY INFORMATION AND SHOULD NOT BE REVIEWED WITH OTHERS.

During FY 1992, at the request of Drug Senior Management, a detailed DEA compliance checklist was developed and a blitz was conducted by the Directors of Distribution and Quality to assess the compliance conditions of all McKesson Drug Distribution Centers. Having completed this task, many facility managers expressed the opinion that DC's should institute (at least

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-128:SEC.X.4

quarterly) a "self-check" to assure that DC compliance does not deteriorate.

As a result, the DEA checklist has been incorporated into the Operations Manual to assist each Distribution Center in complying with Title 21, Code of Federal Regulations (see Exhibit 55-24). This checklist lists the Operations Manual page number pertaining to the subject, the item being audited, the number of points possible, the number of points you scored on that item, and an area for comments if needed.

After the DCM reviews the completed checklist, the DCM must prepare a detailed written action plan to correct all deficiencies and submit the plan to the DDQ and VPDO. Sign the last page and file in the internal DC DEA file (do not put with monthly ARCOS records in vault or cage).

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DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-129:SEC.X.5

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## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-130:SEC.XI.1

XI. CHEMICAL DIVERSION AND TRAFFICKING ACT OF 1988

This law was enacted to establish a system of recordkeeping and reporting requirements that will provide the DEA with a mechanism to track domestic and international movement of certain chemicals, tableting and encapsulating machines.

As a result of this act, any distribution of the listed chemicals in the threshold amounts will make you subject to the records and reporting requirements as outlined in this section.

A. Listed Chemicals

This law gives the DEA authority to stop shipments if there is sufficient reason to believe the shipment is not for legitimate use.

1. The following precursor chemicals fall under the guidelines of this act:

- a. N-acethylantranilic acid and its salts.
- b. Anthranilic acid and its salts.
- c. Benzyl cyanide.
- d. Ephedrine, its salts, optical isomers and salts of optical isomers.
- e. Ergonovine and its salts.
- f. Ergotamine and its salts.
- g. Norpseudoephedrine, its salts, optical isomers and salts of optical isomers.
- h. Phenylacetic acid and its salts.
- i. Phenylpropanolamine, its salts, optical isomers and salts of optical isomers.
- j. Piperidine and its salts.
- k. Pseudoephedrine, its salts, optical isomers and salts of optical isomers.
- l. 3,4-Methylenedioxyphenyl-2 propanone.

2. The following essential chemicals fall under the guidelines of this act:

- a. Acetic anhydride.
- b. Acetone.
- c. Benzyle chloride.
- d. Ethyl ether.
- e. Hydriodic acid.
- f. Potassium permanganate.
- g. 2-Butonone (methyl ethyl ketone).
- h. Toluene.

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-131:SEC.XI.2

### 3. Tableting and encapsulating machines

NOTE: The threshold by weight requirements on the precursor chemicals and threshold by volume requirements on the essential chemicals must be exceeded by a specific customer or customers before you are required to report.

The term "regulated transaction" means the sale, receipt, importation, or exportation of a threshold amount that includes a cumulative threshold amount for multiple transactions of a listed chemical.

The quantitative threshold or cumulative amount for multiple transactions within a calendar month to be utilized in determining whether a receipt, sale, importation, or exportation is a regulated transaction.

Please note that threshold amounts have been listed next to the chemical (see Exhibit 55-29), and there are different threshold amounts for essential chemicals when sold domestically or imported or exported.

### B. Recordkeeping Requirements

Any distributor selling any of these listed chemicals must maintain readily retrievable records and make those records available for inspection by the DEA.

These records must contain the following:

1. Name and address of purchaser.
2. Name and address of seller.
3. Date of the transaction.
4. Quantity of the chemical.
5. Name of chemical.
6. Method of transaction (sale, return, etc.).
7. Type of ID presented by purchaser.
8. Type of ID presented by person who picked up chemicals (assuming it was a will call).
9. Anything unique about the ID (driver's license number, etc.).

### C. Retention Records

1. Precursor chemicals—4 years.
2. Essential chemicals—2 years.

D. Reporting Requirements

Each Distribution Center must report to its Regional Office of the DEA should any of the following take place (see Exhibit 55-30 for guidelines to help detect suspicious situations and/or orders):

1. Any transaction of the listed chemicals involving extraordinary quantity, uncommon method of payment, or a purchase request made by an individual other than your normal customer.
2. A proposed transaction with a person whose description, etc., is furnished in advance by someone representing the DEA.
3. Any loss or disappearance of the listed chemicals that seems unusual or excessive.

E. Importation/Exportation of Listed Chemicals

Any importation or exportation of the listed chemicals will require you to file a declaration 15 days prior to shipment with the DEA. The DEA will use this time to determine if the consignee has a legitimate need for the chemical.

Advance notification may be waived for consignees with "regular customer" status, but shipper is still required to file a declaration.

F. Penalties

Penalties will result for using false identification to obtain chemicals, illegal importation or exportation, failure to maintain records, and other acts related to the diversion of listed chemicals, machines, and flasks.

NOTE: IT IS THE RECOMMENDED POLICY OF McKESSON DRUG COMPANY TO DISCONTINUE THE SALE OF THESE CHEMICALS.

END OF SECTION 55

DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97 PAGE 55-133:SEC.XI.4  
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Menu Actions Tools Bill Knoble Manhattan Associates

Shipment Details

Shipment ID: CS07860886 Bill of Lading Reference Nbr: Trailer Nbr:

Shipper: McKesson Load At: New Castle, DC, 8772, 2798 New Butler Rd, New Castle, PA 16101 United States

Bill To: Bill-to Information Consignee: DISCOUNT DRUG MART INC 28, C, 052827, 8191 COLUMBIA RD, OLMSTED FALLS, OH 44138 United States

Comer Charges: 231.95 USD Product Class: Standard

Equipment: Box Truck 17 Service Level: Courier

Mode: COUR Distance: 172.3 MI

Commodity Class: Commodities Weight: 339.3 LBS

Special Handling: Standard Quantity: 17.75 ActCube

Hazmat: No Volume: 94.49 Cu Ft

Perishable: No Comments: No comments

Billing Method: Collect Event Indicator

Event Notification Indicator

Detention List

Static Route Id: 8772\_004

Order Type: Regular

Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler	Co
1	DC, 8772, New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	PU		8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	1	Co
2	C, 441221, ST JOHN MEDICAL CENTER	ST JOHN MEDICAL CENTER - 29000 CENTER RIDGE ROAD WESTLAKE, OH 44145 United States	DL		8/5/18 01:00 EDT	8/5/18 01:00 EDT	8/5/18 01:00 EDT	8/5/18 01:00 EDT	1 Order	No cor
3	C, 219681, UH CLEVELAND WESTLAKE PHS	UH CLEVELAND WESTLAKE PHS - 29325 HEALTH CAMPUS DR WESTLAKE, OH 44145 United States	DL		8/5/18 01:01 EDT	8/5/18 01:01 EDT	8/5/18 01:01 EDT	8/5/18 01:01 EDT	1 Order	No cor
4	C, 842567, UNIV HOSP AVON REHAB	UNIV HOSP AVON REHAB - 37900 CHESTER ROAD AVON, OH 44011 United States	DL		8/5/18 01:17 EDT	8/5/18 01:17 EDT	8/5/18 01:17 EDT	8/5/18 01:17 EDT	1 Order	No cor
5	C, 208840, UH CLEV WESTLAKE SUR PHS	UH CLEV WESTLAKE SUR PHS - 860 CLAGUE ROAD WESTLAKE, OH 44145 United States	DL		8/5/18 01:27 EDT	8/5/18 01:27 EDT	8/5/18 01:27 EDT	8/5/18 01:27 EDT	1 Order	No cor
6	C, 753355, GENTRY HLTH SERV INC 805	GENTRY HLTH SERV INC 805 - 33381 WALKER ROAD SUITE A AVON LAKE, OH 44012 United States	DL		8/5/18 07:00 EDT	8/5/18 07:05 EDT	8/5/18 07:05 EDT	8/5/18 07:05 EDT	1 Order	No cor
7	C, 051324, DISCOUNT DRUG MART INC 4	DISCOUNT DRUG MART INC 4 - 33382 WALKER RD AVON LAKE, OH 44012 United States	DL		8/5/18 07:05 EDT	8/5/18 07:10 EDT	8/5/18 07:10 EDT	8/5/18 07:10 EDT	1 Order	No cor
8	C, 842566, DISCOUNT DRUG MART 850 CF	DISCOUNT DRUG MART 850 CF - 33381 WALKER ROAD SUITE C AVON LAKE, OH 44012 United States	DL		8/5/18 11:00 EDT	8/5/18 11:05 EDT	8/5/18 11:05 EDT	8/5/18 11:05 EDT	1 Order	No cor
9	C, 619724, DISCOUNT DRUG MART INC 62	DISCOUNT DRUG MART INC 62 - 33552 DETROIT RD AVON, OH 44011 United States	DL		8/5/18 11:19 EDT	8/5/18 11:24 EDT	8/5/18 11:24 EDT	8/5/18 11:24 EDT	1 Order	No cor
10	C, 051539, DISCOUNT DRUG MART INC 10	DISCOUNT DRUG MART INC 10 - 27300 DETROIT AVE WESTLAKE, OH 44145 United States	DL		8/5/18 11:30 EDT	8/5/18 11:35 EDT	8/5/18 11:35 EDT	8/5/18 11:35 EDT	1 Order	No cor
11	C, 850704, RITE AID 4975	RITE AID 4975 - 27175 CENTER RIDGE RD WESTLAKE, OH 44145 United States	DL		8/5/18 11:40 EDT	8/5/18 11:40 EDT	8/5/18 11:40 EDT	8/5/18 11:40 EDT	1 Order	No cor
12	C, 051485, DISCOUNT DRUG MART INC 8	DISCOUNT DRUG MART INC 8 - 24485 LORAIN RD N OLMSTED, OH 44070 United States	DL		8/5/18 11:48 EDT	8/5/18 11:51 EDT	8/5/18 11:51 EDT	8/5/18 11:51 EDT	1 Order	No cor
13	C, 353272, MARC'S O4GN	MARC'S O4GN - 26393 BROOKPARK ROAD NORTH OLMSTED, OH 44070 United States	DL		8/5/18 11:53 EDT	8/5/18 11:53 EDT	8/5/18 11:53 EDT	8/5/18 11:53 EDT	1 Order	No cor
14	C, 052827, DISCOUNT DRUG MART INC 28	DISCOUNT DRUG MART INC 28 - 8191 COLUMBIA RD OLMSTED FALLS, OH 44138 United States	DL		8/5/18 12:00 EDT	8/5/18 12:05 EDT	8/5/18 12:05 EDT	8/5/18 12:05 EDT	1 Order	No cor

Order List

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_042057_20180806_94181_126996104		Standard	1,4	DC, 8772	C, 042057	8.5 Pounds	0.81 ActCube	4.07 Cubic Feet
8772_441221_20180806_94183_126996272		Standard	1,2	DC, 8772	C, 441221	75 Pounds	4 ActCube	15.51 Cubic Feet
8772_353272_20180806_94172_126996274		Standard	1,13	DC, 8772	C, 353272	13.5 Pounds	0.71 ActCube	6.23 Cubic Feet
8772_208840_20180806_94180_126996380		Standard	1,5	DC, 8772	C, 208840	91.9 Pounds	2.52 ActCube	3.53 Cubic Feet
8772_850704_20180806_94174_126996461		Standard	1,11	DC, 8772	C, 850704	28.8 Pounds	1.55 ActCube	9.47 Cubic Feet
8772_619724_20180806_94176_126996494		Standard	1,9	DC, 8772	C, 619724	22.8 Pounds	1.33 ActCube	9.22 Cubic Feet
8772_219681_20180806_94182_126996510		Standard	1,3	DC, 8772	C, 219681	3.2 Pounds	0.11 ActCube	3.24 Cubic Feet
8772_051485_20180806_94173_126996572		Standard	1,12	DC, 8772	C, 051485	44.4 Pounds	3.04 ActCube	14.3 Cubic Feet
8772_051324_20180806_94178_126996585		Standard	1,7	DC, 8772	C, 051324	13 Pounds	0.88 ActCube	6.48 Cubic Feet
8772_051539_20180806_94175_126996600		Standard	1,10	DC, 8772	C, 051539	10.7 Pounds	0.64 ActCube	6.48 Cubic Feet
8772_753355_20180806_94179_126996627		Standard	1,8	DC, 8772	C, 753355	4.8 Pounds	0.51 ActCube	4.32 Cubic Feet
8772_052827_20180806_94171_126996751		Standard	1,14	DC, 8772	C, 052827	21.1 Pounds	1.36 ActCube	9.47 Cubic Feet
8772_842566_20180806_94177_126996793		Standard	1,8	DC, 8772	C, 842566	1.8 Pounds	0.07 ActCube	2.15 Cubic Feet

Tracking Messages

Tms 13  
Paid 12

\* 753355 > Consolidation  
824566 > removed  
email 8-30-18

004  
006  
010  
012  
014  
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052  
054  
060  
064  
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MC-WV-00451.00148

<input type="checkbox"/>	Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
	23018339	Tender Offer	Current	8/6/18 04:53 EDT				No comments	McKesson	8/6/18 04:53 EDT
	23018341	Tender Accept	Current	8/6/18 04:53 EDT				No comments	McKesson	8/6/18 04:53 EDT
	23018348	Arrival 14	Current	8/6/18 04:53 EDT				No comments	AUTOOLVR	8/6/18 04:53 EDT

**Alerts**

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

**Web Tender Response**

Status	Delivered	Comments to Shipper
Response	Accept	
Deadline		
Time Remaining		
Carrier Code	SSDD	
Response By	Manhattan Associates	
Responded On	8/6/18 04:53 EDT	

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MC-WV-00451.00150

Menu Actions Tools Bill Knoble Manhattan Associates

Shipment Details Events | All Cl

Shipment ID CS07885295 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-To Information  
Load At New Castle Consignee DISCOUNT DRUG MART INC 28  
DC 8772 C\_052827  
2798 New Butler Rd 8191 COLUMBIA RD  
New Castle, PA 16101 United States OLMSTED FALLS, OH 44138 United States

Carrier 251.28 USD Product Standard  
Charges Class  
Equipment Box Truck 17 Carrier Ref  
Service Level Courier PO  
Number 8772\_051324\_20180807\_95600, 8772\_051485\_20180807\_95595, 8772\_051539\_20180807\_95601, 8772\_052827\_20180807\_95593, 8772\_207054\_20180807\_95605, 8772\_208840\_20180807\_95602, 8772\_219681\_20180807\_95607, 8772\_353272\_20180807\_95603, 8772\_353272\_20180807\_95594, 8772\_441221\_20180807\_95607, 8772\_610617\_20180807\_95607, 8772\_619724\_20180807\_95598, 8772\_642657\_20180807\_95603, 8772\_753355\_20180807\_95601, 8772\_842566\_20180807\_95607, 8772\_850704\_20180807\_95596, 8772\_850704\_20180807\_95667

Mode COUR Distance 175.1 MI  
Commodity Class Commodities Weight 354.1 LBS  
Special Handling Standard Quantity 23.9 ActCube  
Hazard No Volume 103.4 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator

Event Notification Indicator  
Detention List  
Static Route Id 8772\_004  
Order Type Regular

Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler Orders	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/6/18 12:00 EDT	8/6/18 12:00 EDT	8/6/18 12:00 EDT	8/6/18 12:00 EDT	15 Orders	1
2	C_441221 ST JOHN MEDICAL CENTER	ST JOHN MEDICAL CENTER - 29000 CENTER RIDGE ROAD WESTLAKE, OH 44145 United States	2		8/7/18 01:00 EDT	8/7/18 01:00 EDT	8/7/18 01:00 EDT	8/7/18 01:00 EDT	1 Order	No
3	C_219681 UH CLEVELAND WESTLAKE PHS	UH CLEVELAND WESTLAKE PHS - 29325 HEALTH CAMPUS DR WESTLAKE, OH 44145 United States	2		8/7/18 01:01 EDT	8/7/18 01:01 EDT	8/7/18 01:01 EDT	8/7/18 01:01 EDT	1 Order	No
4	C_207054 UH CLEVELAND WESTLAKE PHS	UH CLEVELAND WESTLAKE PHS - 960 CLAGUE ROAD WESTLAKE, OH 44145 United States	2		8/7/18 01:10 EDT	8/7/18 01:10 EDT	8/7/18 01:10 EDT	8/7/18 01:10 EDT	1 Order	No
5	C_619617 IRELAND CANCER CTR-WSTLAK	IRELAND CANCER CTR-WSTLAK - 980 CLAGUE ROAD WESTLAKE, OH 44145 United States	2		8/7/18 01:10 EDT	8/7/18 01:10 EDT	8/7/18 01:10 EDT	8/7/18 01:10 EDT	1 Order	No
6	C_842657 UNIV HOSP AVON REHAB	UNIV HOSP AVON REHAB - 37900 CHESTER ROAD AVON, OH 44011 United States	2		8/7/18 01:21 EDT	8/7/18 01:21 EDT	8/7/18 01:21 EDT	8/7/18 01:21 EDT	1 Order	No
7	C_208840 UH CLEVELAND WESTLAKE SUR PHS	UH CLEVELAND WESTLAKE SUR PHS - 980 CLAGUE ROAD WESTLAKE, OH 44145 United States	2		8/7/18 01:31 EDT	8/7/18 01:31 EDT	8/7/18 01:31 EDT	8/7/18 01:31 EDT	1 Order	No
8	C_753355 GENENTRY HLTH SERV INC 805	GENENTRY HLTH SERV INC 805 - 33381 WALKER ROAD SUITE A AVON LAKE, OH 44012 United States	2		8/7/18 07:00 EDT	8/7/18 07:00 EDT	8/7/18 07:00 EDT	8/7/18 07:00 EDT	1 Order	No
9	C_051324 DISCOUNT DRUG MART INC 4	DISCOUNT DRUG MART INC 4 - 33382 WALKER RD AVON LAKE, OH 44012 United States	2		8/7/18 07:05 EDT	8/7/18 07:10 EDT	8/7/18 07:10 EDT	8/7/18 07:10 EDT	1 Order	No
10	C_842566 DISCOUNT DRUG MART INC 60 CF	DISCOUNT DRUG MART INC 60 CF - 33381 WALKER ROAD SUITE C AVON LAKE, OH 44012 United States	2		8/7/18 11:00 EDT	8/7/18 11:05 EDT	8/7/18 11:05 EDT	8/7/18 11:05 EDT	1 Order	No
11	C_619724 DISCOUNT DRUG MART INC 62	DISCOUNT DRUG MART INC 62 - 33552 DETROIT RD AVON, OH 44011 United States	2		8/7/18 11:19 EDT	8/7/18 11:24 EDT	8/7/18 11:24 EDT	8/7/18 11:24 EDT	1 Order	No
12	C_051539 DISCOUNT DRUG MART INC 10	DISCOUNT DRUG MART INC 10 - 27309 DETROIT AVE WESTLAKE, OH 44145 United States	2		8/7/18 11:30 EDT	8/7/18 11:35 EDT	8/7/18 11:35 EDT	8/7/18 11:35 EDT	1 Order	No
13	C_850704 RITE AID 4975	RITE AID 4975 - 27175 CENTER RIDGE RD WESTLAKE, OH 44145 United States	2		8/7/18 11:40 EDT	8/7/18 11:40 EDT	8/7/18 11:40 EDT	8/7/18 11:40 EDT	1 Order	No
14	C_051485 DISCOUNT DRUG MART INC 8	DISCOUNT DRUG MART INC 8 - 24485 LORAIN RD N OLMSTED, OH 44070 United States	2		8/7/18 11:40 EDT	8/7/18 11:51 EDT	8/7/18 11:51 EDT	8/7/18 11:51 EDT	1 Order	No
15	C_353272 MARCS O4GN	MARCS O4GN - 26393 BROOKPARK ROAD NORTH OLMSTED, OH 44070 United States	2		8/7/18 11:53 EDT	8/7/18 11:53 EDT	8/7/18 11:53 EDT	8/7/18 11:53 EDT	1 Order	No
16	C_052827 DISCOUNT DRUG MART INC 28	DISCOUNT DRUG MART INC 28 - 8191 COLUMBIA RD OLMSTED FALLS, OH 44138 United States	2		8/7/18 12:00 EDT	8/7/18 12:05 EDT	8/7/18 12:05 EDT	8/7/18 12:05 EDT	1 Order	No

Order List

Order ID	Split Id	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_010617_20180807_95604_127068143		Standard	1,5	DC_8772	C_610617	10.5 Pounds	1.49 ActCube	2.86 Cubic Feet
8772_842657_20180807_95603_127068304		Standard	1,8	DC_8772	C_842657	4.5 Pounds	0.66 ActCube	4.53 Cubic Feet
8772_207054_20180807_95605_127068483		Standard	1,4	DC_8772	C_207054	63.1 Pounds	2.14 ActCube	5.33 Cubic Feet
8772_441221_20180807_95607_127068485		Standard	1,2	DC_8772	C_441221	70.4 Pounds	5.52 ActCube	21.01 Cubic Feet
8772_353272_20180807_95594_127068468		Standard	1,15	DC_8772	C_353272	15.3 Pounds	1.79 ActCube	8.74 Cubic Feet
8772_208840_20180807_95602_127068574		Standard	1,7	DC_8772	C_208840	15.2 Pounds	0.71 ActCube	3.89 Cubic Feet
8772_850704_20180807_95596_127068671		Standard	1,13	DC_8772	C_850704	25.9 Pounds	1.44 ActCube	8.14 Cubic Feet
8772_619724_20180807_95598_127068705		Standard	1,11	DC_8772	C_619724	12.4 Pounds	0.73 ActCube	7.56 Cubic Feet
8772_219681_20180807_95606_127068722		Standard	1,3	DC_8772	C_219681	5.8 Pounds	0.21 ActCube	3.24 Cubic Feet
8772_051485_20180807_95595_127068783		Standard	1,14	DC_8772	C_051485	5.7 Pounds	0.31 ActCube	3.24 Cubic Feet

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8772_051324_20180807_95600_127088797	Standard	1,9	DC_8772	C_051324	3 9 Pounds	0 19 ActCube	3 24 Cubic Feet
8772_051539_20180807_95597_127088814	Standard	1,12	DC_8772	C_051539	23 6 Pounds	1 18 ActCube	9 78 Cubic Feet
8772_753355_20180807_95601_127088843	Standard	1,6	DC_8772	C_753355	82 8 Pounds	7 11 ActCube	16 64 Cubic Feet
8772_052827_20180807_95593_127088972	Standard	1,16	DC_8772	C_052827	8 4 Pounds	0 39 ActCube	4 32 Cubic Feet
8772_842566_20180807_95599_127089019	Standard	1,10	DC_8772	C_842566	0 4 Pounds	0 03 ActCube	1 08 Cubic Feet

## Tracking Messages

<input type="checkbox"/>	Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
<input checked="" type="checkbox"/>	<u>23032484</u>	Tender Offer	Current	8/7/18 04:59 EDT				No comments	McKesson	8/7/18 04:59 EDT
<input checked="" type="checkbox"/>	<u>23032485</u>	Tender Accept	Current	8/7/18 04:59 EDT				No comments	McKesson	8/7/18 04:59 EDT
<input checked="" type="checkbox"/>	<u>23032483</u>	Arrival	Current	8/7/18 04:59 EDT				No comments	AUTODLVR	8/7/18 04:59 EDT

Add Multiple Add Single

## Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

## Web Tender Response

Status Delivered Comments to Shipper  
 Response Accept  
 Deadline  
 Time Remaining  
 Carrier Code SSDD  
 Response By Manhattan Associates  
 Responded On 8/7/18 04:59 EDT

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MC-WV-00451.00154

Menu Actions Tools Bill Printable 2 0 0 Sign Out Manhattan Associates

Shipment Details Events All C

Shipment ID CS07874099 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-to Information  
Load At New Castle Consignee DISCOUNT DRUG MART INC 28  
DC 8772 C\_052827  
2798 New Butler Rd 8191 COLUMBIA RD  
New Castle, PA 16101 United States OLMSTED FALLS, OH 44138 United States

Carrier Charges 231.95 USD Product Class Standard  
Equipment Box Truck 17 Carrier Ref  
Service Level Courier Number  
8772\_051324\_20180809\_98673, 8772\_051485\_20180809\_98668, 8772\_051539\_20180809\_98670, 8772\_052827\_20180809\_98671, 8772\_207054\_20180809\_98676, 8772\_207054\_20180809\_98677, 8772\_219681\_20180809\_98678, 8772\_219681\_20180809\_98679, 8772\_353272\_20180809\_98667, 8772\_441221\_20180809\_98670, 8772\_610939\_20180809\_98677, 8772\_619724\_20180809\_98678, 8772\_619724\_20180809\_98679, 8772\_642657\_20180809\_98675, 8772\_753355\_20180809\_98674, 8772\_842568\_20180809\_98680, 8772\_842568\_20180809\_98681

Mode COVR Distance 161.6 MI  
Commodity Class Commodities Weight 456.8 LBS  
Special Handling Standard Quantity 21.93 ActCube  
Hazard No Volume 89.08 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator

Event Notification Indicator  
Detention List  
Static Route Id 8772\_004  
Order Type Regular

Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler	CA
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/8/18 12:00 EDT	8/8/18 12:00 EDT	8/8/18 12:00 EDT	8/8/18 12:00 EDT	1.0 Order	Can
2	C_441221 ST. JOHN MEDICAL CENTER	ST. JOHN MEDICAL CENTER - 26000 CENTER RIDGE ROAD WESTLAKE, OH 44145 United States	2		8/8/18 01:00 EDT	8/8/18 01:00 EDT	8/8/18 01:00 EDT	8/8/18 01:00 EDT	1.0 Order	Can
3	C_219681 UH CLEVELAND WESTLAKE PHS	UH CLEVELAND WESTLAKE PHS - 29325 HEALTH CAMPUS DR WESTLAKE, OH 44145 United States	2		8/8/18 01:01 EDT	8/8/18 01:01 EDT	8/8/18 01:01 EDT	8/8/18 01:01 EDT	1.0 Order	Can
4	C_810939 UH CLEVELAND WESTLAKE	UH CLEVELAND WESTLAKE - 25325 HEALTH CAMPUS DR WESTLAKE, OH 44145 United States	2		8/8/18 01:01 EDT	8/8/18 01:01 EDT	8/8/18 01:01 EDT	8/8/18 01:01 EDT	1.0 Order	Can
5	C_207054 UH CLEVELAND WESTLAKE PHS	UH CLEVELAND WESTLAKE PHS - 980 CLAGUE ROAD WESTLAKE, OH 44145 United States	2		8/8/18 01:10 EDT	8/8/18 01:10 EDT	8/8/18 01:10 EDT	8/8/18 01:10 EDT	1.0 Order	Can
6	C_642657 UNIV HOSP AVON REHAB	UNIV HOSP AVON REHAB - 37900 CHESTER ROAD AVON, OH 44011 United States	2		8/8/18 01:21 EDT	8/8/18 01:21 EDT	8/8/18 01:21 EDT	8/8/18 01:21 EDT	1.0 Order	Can
7	C_753355 GENTRY HLTH SERV INC 805	GENTRY HLTH SERV INC 805 - 33381 WALKER ROAD SUITE A AVON LAKE, OH 44012 United States	2		8/8/18 01:31 EDT	8/8/18 01:31 EDT	8/8/18 01:31 EDT	8/8/18 01:31 EDT	1.0 Order	Can
8	C_051324 DISCOUNT DRUG MART INC 4	DISCOUNT DRUG MART INC 4 - 33382 WALKER RD AVON LAKE, OH 44012 United States	2		8/8/18 01:45 EDT	8/8/18 01:45 EDT	8/8/18 01:45 EDT	8/8/18 01:45 EDT	1.0 Order	Can
9	C_842568 DISCOUNT DRUG MART INC 80	DISCOUNT DRUG MART INC 80 - 33381 WALKER ROAD SUITE C AVON LAKE, OH 44012 United States	2		8/8/18 01:50 EDT	8/8/18 01:50 EDT	8/8/18 01:50 EDT	8/8/18 01:50 EDT	1.0 Order	Can
10	C_619724 DISCOUNT DRUG MART INC 82	DISCOUNT DRUG MART INC 82 - 33552 DETROIT RD AVON, OH 44011 United States	2		8/8/18 02:00 EDT	8/8/18 02:00 EDT	8/8/18 02:00 EDT	8/8/18 02:00 EDT	1.0 Order	Can
11	C_051539 DISCOUNT DRUG MART INC 10	DISCOUNT DRUG MART INC 10 - 27300 DETROIT AVE WESTLAKE, OH 44145 United States	2		8/8/18 02:11 EDT	8/8/18 02:11 EDT	8/8/18 02:11 EDT	8/8/18 02:11 EDT	1.0 Order	Can
12	C_850704 RITE AID 4975	RITE AID 4975 - 27175 CENTER RIDGE RD WESTLAKE, OH 44145 United States	2		8/8/18 02:21 EDT	8/8/18 02:21 EDT	8/8/18 02:21 EDT	8/8/18 02:21 EDT	1.0 Order	Can
13	C_051485 DISCOUNT DRUG MART INC 8	DISCOUNT DRUG MART INC 8 - 24485 LORAIN RD N OLMSTED, OH 44070 United States	2		8/8/18 02:27 EDT	8/8/18 02:27 EDT	8/8/18 02:27 EDT	8/8/18 02:27 EDT	1.0 Order	Can
14	C_353272 MARC'S O'GRN	MARC'S O'GRN - 26393 BROOKPARK ROAD NORTH OLMSTED, OH 44070 United States	2		8/8/18 02:34 EDT	8/8/18 02:34 EDT	8/8/18 02:34 EDT	8/8/18 02:34 EDT	1.0 Order	Can
15	C_052827 DISCOUNT DRUG MART INC 28	DISCOUNT DRUG MART INC 28 - 8191 COLUMBIA RD OLMSTED FALLS, OH 44138 United States	2		8/8/18 02:41 EDT	8/8/18 02:41 EDT	8/8/18 02:41 EDT	8/8/18 02:41 EDT	1.0 Order	Can

Order List

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_610939_20180809_98677_127217039		Standard	1,4	DC_8772	C_610939	20.0 Pounds	4.23 ActCube	4.23 Cubic Feet
8772_042657_20180809_98675_127217180		Standard	1,6	DC_8772	C_642657	4.4 Pounds	0.48 ActCube	0.48 Cubic Feet
8772_207054_20180809_98676_127217341		Standard	1,5	DC_8772	C_207054	29.3 Pounds	1.38 ActCube	4.32 Cubic Feet
8772_441221_20180809_98679_127217345		Standard	1,2	DC_8772	C_441221	92.1 Pounds	4.1 ActCube	17.67 Cubic Feet
8772_353272_20180809_98667_127217347		Standard	1,14	DC_8772	C_353272	5.8 Pounds	0.3 ActCube	5.4 Cubic Feet
8772_850704_20180809_98669_127217529		Standard	1,12	DC_8772	C_850704	20.6 Pounds	1.52 ActCube	7.18 Cubic Feet
8772_619724_20180809_98671_127217584		Standard	1,10	DC_8772	C_619724	20.4 Pounds	1.08 ActCube	8.39 Cubic Feet
8772_219681_20180809_98678_127217580		Standard	1,3	DC_8772	C_219681	171.2 Pounds	8.08 ActCube	10.71 Cubic Feet
8772_051485_20180809_98668_127217642		Standard	1,13	DC_8772	C_051485	4.8 Pounds	0.5 ActCube	4.05 Cubic Feet
8772_051324_20180809_98673_127217658		Standard	1,8	DC_8772	C_051324	13.6 Pounds	0.74 ActCube	6.23 Cubic Feet
8772_051539_20180809_98670_127217673		Standard	1,11	DC_8772	C_051539	53.4 Pounds	0.33 ActCube	6.48 Cubic Feet
8772_753355_20180809_98674_127217701		Standard	1,7	DC_8772	C_753355	3 Pounds	0.24 ActCube	3.24 Cubic Feet

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MC-WV-00451.00156

8772_052827_20180809_98666_127217830	Standard	1.15	DC_8772_C_052827	12.5 Pounds	0.85 ActCube	5.15 Cubic Feet
8772_642560_20180809_98672_127217877	Standard	1.9	DC_8772_C_642560	5.1 Pounds	0.15 ActCube	1.08 Cubic Feet

## Tracking Messages

<input type="checkbox"/>	Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
	23058412	Tender Offer	Current	8/9/18 04:50 EDT				No comments	McKesson	8/9/18 04:50 EDT
	23058414	Tender Accept	Current	8/9/18 04:50 EDT				No comments	McKesson	8/9/18 04:50 EDT
	23058429	Arrival 15	Current	8/9/18 04:50 EDT				No comments	AUTODLVR	8/9/18 04:50 EDT

Add Multiple Add Single

## Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

## Web Tender Response

Status: Delivered  
 Response: Accept  
 Deadline:  
 Time Remaining:  
 Carrier Code: S500  
 Response By: Manhattan Associates  
 Responded On: 8/9/18 04:50 EDT

<https://lg.mckesson.com/ofr/ra/jsp/ShipmentDetails.jsp?previousPage=webTenders&shipm...> 8/30/2018

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MC-WV-00451.00158

Menu Actions Tools

Shipment Details

Events | All

Shipment ID: CS07880847 Bill of Lading  
Reference Nbr Trailer Nbr

Tractor Nbr

Shipper McKesson Bill To Bill-to information  
Load At New Castle Consignee RITE AID 7825  
DC 8772 C 574345  
2798 New Butler Rd 201 DEVINE DR  
New Castle, PA 16101 United States WEXFORD, PA 15090 United States

Carrier 328 59 USD Product Class Standard  
Charges

Equipment Carrier Ref  
Service Level Courier PO Number

Mode GOUR Distance 134.3 MI  
Commodity Class Commodities Weight 676.8 LBS  
Special Handling Standard Quantity 36.83 ActCube  
Hazard No Volume 191.84 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator

Event Notification Indicator  
Detention List  
Static Route Id 8772\_101

Order Type Regular

Stops

Stop	Customer	Address	Dock PID	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler Orders	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	1 Order	No
2	C 163368 WEST PENN OP WEXFORD PHS	WEST PENN OP WEXFORD PHS - 12311 PERRY HWY STE A WEXFORD, PA 15090 United States	2		8/5/18 01:00 EDT	8/5/18 01:00 EDT	8/5/18 01:00 EDT	8/5/18 01:00 EDT	1 Order	No
3	C 129191 AHN PHARMACY	AHN PHARMACY - 12311 PERRY HWY STE F WEXFORD, PA 15090 United States	2		8/5/18 01:00 EDT	8/5/18 01:00 EDT	8/5/18 01:00 EDT	8/5/18 01:00 EDT	1 Order	No
4	C 129990 PHARMBLUE LLC	PHARMBLUE LLC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
5	C 163569 CARACOLE INC	CARACOLE INC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
6	C 163730 RURAL AIDS ACTION COMM	RURAL AIDS ACTION COMM - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
7	C 185251 PHARMBLUE LLC/AIDS CR PHS	PHARMBLUE LLC/AIDS CR PHS - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
8	C 185895 BRIDGING ACCESS TO CARE	BRIDGING ACCESS TO CARE - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
9	C 186539 AIDS DELAWARE INC	AIDS DELAWARE INC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
10	C 186575 SACRED HEART REHAB CENTER	SACRED HEART REHAB CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
11	C 218901 BEBASHI TRANSITION TO HPE	BEBASHI TRANSITION TO HPE - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
12	C 229096 WESTERN NC AIDS PROJECT	WESTERN NC AIDS PROJECT - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
13	C 229903 OUTPATIENT MEDICAL CENTER	OUTPATIENT MEDICAL CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
14	C 175858 RX BLUESTAR/ACTIONAID PHS	RX BLUESTAR/ACTIONAID PHS - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
15	C 212190 RX BLUE STAR SOLUTIONS	RX BLUE STAR SOLUTIONS - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
16	C 219545 OPEN DOOR OF GRTR ELGIN	OPEN DOOR OF GRTR ELGIN - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15086 United States	2		8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	8/5/18 01:02 EDT	1 Order	No
17	C 854886 CS NORTH HILLS PASSAV HSP	CS NORTH HILLS PASSAV HSP - 8100 BARCOCK BLVD PITTSBURGH, PA 15237 United States	2		8/5/18 01:13 EDT	8/5/18 01:13 EDT	8/5/18 01:13 EDT	8/5/18 01:13 EDT	1 Order	No
18	C 882064 RITE AID 10953	RITE AID 10953 - 1130 PERRY HWY PITTSBURGH, PA 15207 United States	2		8/5/18 01:20 EDT	8/5/18 01:20 EDT	8/5/18 01:20 EDT	8/5/18 01:20 EDT	1 Order	No
19	C 850352 RITE AID 10929	RITE AID 10929 - 3730 BRIGHTON RD PITTSBURGH, PA 15212 United States	2		8/5/18 01:41 EDT	8/5/18 01:41 EDT	8/5/18 01:41 EDT	8/5/18 01:41 EDT	1 Order	No
20	C 857919 RITE AID 10940	RITE AID 10940 - 513 PERRY HWY PITTSBURGH, PA 15229 United States	2		8/5/18 01:56 EDT	8/5/18 01:56 EDT	8/5/18 01:56 EDT	8/5/18 01:56 EDT	1 Order	No
21	C 891729 RITE AID 11816	RITE AID 11816 - 4770 MCKNIGHT RD PITTSBURGH, PA 15237 United States	2		8/5/18 02:01 EDT	8/5/18 02:01 EDT	8/5/18 02:01 EDT	8/5/18 02:01 EDT	1 Order	No

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22	C 848921 RITE AID 10920	RITE AID 10920 - 535 LINCOLN AVE PITTSBURGH, PA 15202 United States	2	DL	8/6/18 02 17 EDT	8/6/18 02 17 EDT	1	Co
23	C 849103 RITE AID 10905	RITE AID 10905 - 1701 DUNCAN AVE ALLISON PARK, PA 15101 United States	2	DL	8/6/18 02 38 EDT	8/6/18 02 38 EDT	1	Co
24	C 841337 RITE AID 10909	RITE AID 10909 - 1710 MT ROYAL BLVD GLENSHAW, PA 15118 United States	2	DL	8/6/18 03 09 EDT	8/6/18 03 09 EDT	1	Co
25	C 743747 RITE AID 1944	RITE AID 1944 - 900 MOUNT ROYAL BLVD PITTSBURGH, PA 15223 United States	2	DL	8/6/18 03 14 EDT	8/6/18 03 14 EDT	1	Co
26	C 850930 RITE AID 10938	RITE AID 10938 - 880 BUTLER ST PITTSBURGH, PA 15223 United States	2	DL	8/6/18 03 17 EDT	8/6/18 03 17 EDT	1	Co
27	C 849045 RITE AID 10904	RITE AID 10904 - 4800 WILLIAM FLYNN HWY 10 ALLISON PARK, PA 15101 United States	2	DL	8/6/18 03 28 EDT	8/6/18 03 28 EDT	1	Co
28	C 751777 WAL-MART 2903	WAL-MART 2903 - 300 WALMART DR GIBSONIA, PA 15044 United States	2	DL	8/6/18 03 38 EDT	8/6/18 03 38 EDT	1	Co
29	C 738203 RITE AID 7832	RITE AID 7832 - 4155 EWALY RD GIBSONIA, PA 15044 United States	2	DL	8/6/18 03 40 EDT	8/6/18 03 40 EDT	1	Co
30	C 574345 RITE AID 7825	RITE AID 7825 - 201 DEVINE DR WEXFORD, PA 15090 United States	2	DL	8/6/18 03 48 EDT	8/6/18 03 48 EDT	1	Co
					8/6/18 23 00 EDT	8/6/18 23 00 EDT	1	Co

## Order List.

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_129191_20180806_84772_120995847		Standard	1,3	DC_8772	C_129191	1.6 Pounds	0.13 ActCube	1.08 Cubic Feet
8772_185251_20180806_84758_120995911		Standard	1,7	DC_8772	C_185251	2.8 Pounds	0.14 ActCube	7.56 Cubic Feet
8772_129998_20180806_84771_120995913		Standard	1,4	DC_8772	C_129998	138.4 Pounds	3.9 ActCube	11.39 Cubic Feet
8772_103730_20180806_84769_120995931		Standard	1,8	DC_8772	C_103730	0.5 Pounds	0.05 ActCube	1.08 Cubic Feet
8772_105955_20180806_84707_120995985		Standard	1,8	DC_8772	C_105955	0.1 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_103569_20180806_84770_120996003		Standard	1,5	DC_8772	C_103569	0.8 Pounds	0.04 ActCube	3.74 Cubic Feet
8772_103368_20180806_84773_120996013		Standard	1,2	DC_8772	C_103368	1.9 Pounds	0.16 ActCube	2.16 Cubic Feet
8772_105575_20180806_84765_120996015		Standard	1,10	DC_8772	C_105575	0.3 Pounds	0.02 ActCube	1.08 Cubic Feet
8772_228098_20180806_84763_120996101		Standard	1,12	DC_8772	C_228098	1.2 Pounds	0.05 ActCube	2.16 Cubic Feet
8772_102056_20180806_84757_120996154		Standard	1,18	DC_8772	C_102056	39.4 Pounds	2.12 ActCube	10.7 Cubic Feet
8772_105488_20180806_84758_120996186		Standard	1,17	DC_8772	C_105488	19.7 Pounds	4.91 ActCube	14.45 Cubic Feet
8772_1074345_20180806_84745_120996255		Standard	1,30	DC_8772	C_1074345	61.1 Pounds	2.72 ActCube	11.86 Cubic Feet
8772_175859_20180806_84701_120996337		Standard	1,14	DC_8772	C_175859	0.4 Pounds	0.02 ActCube	1.08 Cubic Feet
8772_739203_20180806_84746_120996343		Standard	1,29	DC_8772	C_739203	42.5 Pounds	2.36 ActCube	10.05 Cubic Feet
8772_1050352_20180806_84758_120996351		Standard	1,19	DC_8772	C_1050352	48.8 Pounds	2.88 ActCube	14.37 Cubic Feet
8772_106539_20180806_84766_120996412		Standard	1,9	DC_8772	C_106539	0.9 Pounds	0.03 ActCube	1.08 Cubic Feet
8772_218901_20180806_84764_120996469		Standard	1,11	DC_8772	C_218901	0.2 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_1050630_20180806_84749_120996476		Standard	1,26	DC_8772	C_1050630	37.2 Pounds	1.71 ActCube	10.3 Cubic Feet
8772_229903_20180806_84762_120996504		Standard	1,13	DC_8772	C_229903	0.1 Pounds	0 ActCube	1.08 Cubic Feet
8772_1041337_20180806_84751_120996514		Standard	1,24	DC_8772	C_1041337	39.8 Pounds	2.74 ActCube	12.08 Cubic Feet
8772_210545_20180806_84759_120996530		Standard	1,10	DC_8772	C_210545	4.1 Pounds	0.22 ActCube	5.4 Cubic Feet
8772_1040921_20180806_84750_120996602		Standard	1,22	DC_8772	C_1040921	34.3 Pounds	1.88 ActCube	8.14 Cubic Feet
8772_212190_20180806_84760_120996678		Standard	1,15	DC_8772	C_212190	0.4 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_1040045_20180806_84748_120996687		Standard	1,27	DC_8772	C_1040045	19.3 Pounds	1.01 ActCube	7.31 Cubic Feet
8772_1040103_20180806_84752_120996695		Standard	1,23	DC_8772	C_1040103	40.8 Pounds	2.15 ActCube	11.13 Cubic Feet
8772_751777_20180806_84747_120996784		Standard	1,28	DC_8772	C_751777	13.8 Pounds	0.93 ActCube	6.48 Cubic Feet
8772_743747_20180806_84750_120996824		Standard	1,25	DC_8772	C_743747	31.2 Pounds	1.86 ActCube	11.36 Cubic Feet
8772_1057919_20180806_84755_120997916		Standard	1,20	DC_8772	C_1057919	36 Pounds	2.32 ActCube	10.05 Cubic Feet
8772_1091729_20180806_84754_120997950		Standard	1,21	DC_8772	C_1091729	39.7 Pounds	2.45 ActCube	12.21 Cubic Feet

## Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref. Nbr	Handler	Comments	Created By	Created On
23019204	Tender Offer	Current	8/6/18 04 50 EDT				No comments	McKesson	8/6/18 04 50 EDT
23019205	Tender Accept	Current	8/6/18 04 50 EDT				No comments	McKesson	8/6/18 04 50 EDT
23019245	Arrival	Current	8/6/18 04 51 EDT				No comments	AUTODLR	8/6/18 04 51 EDT

Add Multiple Add Single

## Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

## Web Tender Response

Status	Delivered	Comments to Shipper
Response	Accept	
Deadline		
Time Remaining		
Carrier Code	SSDD	
Response By	Manhattan Associates	
Responded On	8/6/18 04:50 EDT	

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Menu Actions Tools Bill Knoble Sign Out Manhattan Associates

### Shipment Details

Events | All Co

Shipment ID: CS0785260 Bill of Lading  
Reference Nbr  
Tractor Nbr

Shipper: McKesson  
Load At: New Castle  
DC: 8772  
2798 New Butler Rd  
New Castle, PA 16101 United States

Bill To: Bill-to Information  
Consignee: RITE AID 7825  
C: 574345  
201 DEVINE DR  
WEXFORD, PA 15090 United States

Carrier: 328.59 USD  
Charges  
Equipment  
Service Level: Courier  
Product Class: Standard  
Carrier Ref  
PO Number

Mode: COUR  
Commodity Class: Commodities  
Special Handling: Standard  
Hazard: No  
Perishable: No  
Billing Method: Collect

Distance: 132 MI  
Weight: 528.8 LBS  
Quantity: 25.43 ActCube  
Volume: 169.39 CuFi  
Comments: No comments  
Event Indicator

Event Notification Indicator  
Detention List  
Static Route Id: 8772\_101

Order Type: Regular

Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/6/18 12:00 EDT	8/6/18 12:00 EDT	8/6/18 18:15 EDT	8/7/18 18:15 EDT	28 Orders	Co
2	C: 307579 CONNECTED HEALTH PHARMACY	CONNECTED HEALTH PHARMACY - 12620 PERRY HIGHWAY WEXFORD, PA 15090 United States	2		8/7/18 01:00 EDT	8/7/18 01:00 EDT	8/7/18 18:48 EDT	8/7/18 18:48 EDT	1 Order	Co
3	C: 163368 WEST PENN OF WEXFORD PHS	WEST PENN OF WEXFORD PHS - 12311 PERRY HWY STE A WEXFORD, PA 15090 United States	2		8/7/18 01:00 EDT	8/7/18 01:00 EDT	8/7/18 18:48 EDT	8/7/18 18:48 EDT	1 Order	No cor
4	C: 074778 AHN WP PHS	AHN WP PHS - 12311 PERRY HIGHWAY WEXFORD, PA 15090 United States	2		8/7/18 01:00 EDT	8/7/18 01:00 EDT	8/7/18 18:48 EDT	8/7/18 18:48 EDT	1 Order	No cor
5	C: 128996 PHARMBLUE LLC	PHARMBLUE LLC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
6	C: 103565 CARACOLE INC	CARACOLE INC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
7	C: 153730 RURAL AIDS ACTION COMM	RURAL AIDS ACTION COMM - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
8	C: 185251 PHARMBLUE LLC/AIDS PHS	PHARMBLUE LLC/AIDS PHS - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
9	C: 218901 BEGASHI TRANSITION TO HPE	BEGASHI TRANSITION TO HPE - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
10	C: 228080 WESTERN NC AIDS PROJECT	WESTERN NC AIDS PROJECT - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
11	C: 226903 OUTPATIENT MEDICAL CENTER	OUTPATIENT MEDICAL CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 01:02 EDT	8/7/18 01:02 EDT	8/7/18 18:50 EDT	8/7/18 18:50 EDT	1 Order	No cor
12	C: 088945 LGBT LIFE CENTER	LGBT LIFE CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 04:00 EDT	8/7/18 04:10 EDT	8/7/18 18:50 EDT	8/7/18 19:00 EDT	1 Order	No cor
13	C: 753553 KENT SUSSEX COMM HOSP	KENT SUSSEX COMM HOSP - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15086 United States	2		8/7/18 04:10 EDT	8/7/18 04:10 EDT	8/7/18 20:19 EDT	8/7/18 20:19 EDT	1 Order	No cor
14	C: 175959 RX BLUESTAR/ACTIONAID PHS	RX BLUESTAR/ACTIONAID PHS - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15086 United States	2		8/7/18 04:10 EDT	8/7/18 04:10 EDT	8/7/18 20:19 EDT	8/7/18 20:19 EDT	1 Order	No cor
15	C: 212190 RX BLUE STAR SOLUTIONS	RX BLUE STAR SOLUTIONS - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15086 United States	2		8/7/18 04:10 EDT	8/7/18 04:10 EDT	8/7/18 20:19 EDT	8/7/18 20:19 EDT	1 Order	No cor
16	C: 218545 OPEN DOOR OF GRTR ELGIN	OPEN DOOR OF GRTR ELGIN - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15086 United States	2		8/7/18 04:10 EDT	8/7/18 04:10 EDT	8/7/18 20:19 EDT	8/7/18 20:19 EDT	1 Order	No cor
17	C: 802058 RITE AID 10929	RITE AID 10953 - 1130 PERRY HWY PITTSBURGH, PA 15237 United States	2		8/7/18 04:23 EDT	8/7/18 04:23 EDT	8/7/18 20:32 EDT	8/7/18 20:32 EDT	1 Order	No cor
18	C: 850357 RITE AID 10929	RITE AID 10929 - 3730 BRIGHTON RD PITTSBURGH, PA 15212 United States	2		8/7/18 04:44 EDT	8/7/18 04:44 EDT	8/7/18 20:53 EDT	8/7/18 20:53 EDT	1 Order	No cor
19	C: 857919 RITE AID 10940	RITE AID 10940 - 513 PERRY HWY PITTSBURGH, PA 15229 United States	2		8/7/18 04:59 EDT	8/7/18 04:59 EDT	8/7/18 21:08 EDT	8/7/18 21:08 EDT	1 Order	No cor
20	C: 891729 RITE AID 11916	RITE AID 11915 - 4770 MCKNIGHT RD PITTSBURGH, PA 15237 United States	2		8/7/18 05:04 EDT	8/7/18 05:04 EDT	8/7/18 21:13 EDT	8/7/18 21:13 EDT	1 Order	No cor
21	C: 848921 RITE AID 10920	RITE AID 10920 - 535 LINCOLN AVE PITTSBURGH, PA 15202 United States	2		8/7/18 05:20 EDT	8/7/18 05:20 EDT				No cor

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22	<u>RITE AID 10920</u> C_840103 <u>RITE AID 10905</u>	RITE AID 10905 - 1701 DUNCAN AVE ALLISON PARK, PA 15101 United States	DL	8/7/18 21:29 EDT	8/7/18 21:29 EDT	1 Order	1 Cn
23	C_841337 <u>RITE AID 10909</u>	RITE AID 10909 - 1710 MT ROYAL BLVD GLENSHAW, PA 15118 United States	DL	8/7/18 05:41 EDT	8/7/18 05:41 EDT	1 Order	1 Cn
24	C_743747 <u>RITE AID 1944</u>	RITE AID 1944 - 900 MOUNT ROYAL BLVD PITTSBURGH, PA 15223 United States	DL	8/7/18 21:50 EDT	8/7/18 21:50 EDT	1 Order	1 Cn
25	C_850030 <u>RITE AID 10938</u>	RITE AID 10938 - 880 BUTLER ST PITTSBURGH, PA 15223 United States	DL	8/7/18 06:12 EDT	8/7/18 06:12 EDT	1 Order	1 Cn
26	C_840045 <u>RITE AID 10904</u>	RITE AID 10904 - 4980 WILLIAM FLYNN HWY 10 ALLISON PARK, PA 15101 United States	DL	8/7/18 06:17 EDT	8/7/18 06:17 EDT	1 Order	1 Cn
27	C_751777 <u>WAL-MART 2603</u>	WAL-MART 2603 - 300 WALMART DR GIBSONIA, PA 15044 United States	DL	8/7/18 22:20 EDT	8/7/18 22:20 EDT	1 Order	1 Cn
28	C_739203 <u>RITE AID 7832</u>	RITE AID 7832 - 4155 EWALT RD GIBSONIA, PA 15044 United States	DL	8/7/18 06:20 EDT	8/7/18 06:20 EDT	1 Order	1 Cn
29	C_574345 <u>RITE AID 7825</u>	RITE AID 7825 - 201 DEVINE DR WEXFORD, PA 15090 United States	DL	8/7/18 22:29 EDT	8/7/18 22:29 EDT	1 Order	1 Cn
			DL	8/7/18 06:41 EDT	8/7/18 06:41 EDT	1 Order	1 Cn
			DL	8/7/18 22:50 EDT	8/7/18 22:50 EDT	1 Order	1 Cn
			DL	8/7/18 06:43 EDT	8/7/18 06:43 EDT	1 Order	1 Cn
			DL	8/7/18 22:52 EDT	8/7/18 22:52 EDT	1 Order	1 Cn
			DL	8/7/18 06:51 EDT	8/7/18 06:51 EDT	1 Order	1 Cn
			DL	8/7/18 23:00 EDT	8/7/18 23:00 EDT	1 Order	1 Cn

## Order List

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_185251_20180807_98304_127068105		Standard	1,0	DC_8772	C_185251	0.5 Pounds	0.03 ActCube	1.08 Cubic Feet
8772_129998_20180807_98307_127068107		Standard	1,5	DC_8772	C_129998	74.1 Pounds	3.68 ActCube	9.32 Cubic Feet
8772_163730_20180807_98305_127068128		Standard	1,7	DC_8772	C_163730	0.2 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_163589_20180807_98308_127068202		Standard	1,8	DC_8772	C_163589	7.3 Pounds	0.37 ActCube	8.48 Cubic Feet
8772_163368_20180807_98309_127068210		Standard	1,3	DC_8772	C_163368	11.5 Pounds	0.69 ActCube	5.4 Cubic Feet
8772_974778_20180807_98306_127068233		Standard	1,4	DC_8772	C_974778	14.6 Pounds	0.66 ActCube	4.07 Cubic Feet
8772_229098_20180807_98302_127068301		Standard	1,10	DC_8772	C_229098	4.4 Pounds	0.18 ActCube	3.24 Cubic Feet
8772_862058_20180807_98285_127068362		Standard	1,17	DC_8772	C_862058	32.3 Pounds	1.58 ActCube	10.3 Cubic Feet
8772_574345_20180807_98283_127068487		Standard	1,29	DC_8772	C_574345	45.1 Pounds	2.27 ActCube	11.38 Cubic Feet
8772_175859_20180807_98298_127068551		Standard	1,14	DC_8772	C_175859	0.4 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_739203_20180807_98284_127068557		Standard	1,28	DC_8772	C_739203	38.5 Pounds	2.3 ActCube	11.13 Cubic Feet
8772_850352_20180807_98294_127068565		Standard	1,18	DC_8772	C_850352	43.1 Pounds	2.12 ActCube	11.13 Cubic Feet
8772_899945_20180807_98300_127068637		Standard	1,12	DC_8772	C_899945	0.1 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_507528_20180807_98310_127068653		Standard	1,2	DC_8772	C_507528	1.2 Pounds	0.04 ActCube	2.16 Cubic Feet
8772_218901_20180807_98303_127068691		Standard	1,9	DC_8772	C_218901	0.7 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_856630_20180807_98287_127068696		Standard	1,25	DC_8772	C_856630	24.9 Pounds	1.35 ActCube	8.14 Cubic Feet
8772_229902_20180807_98301_127068714		Standard	1,11	DC_8772	C_229902	0.1 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_841337_20180807_98289_127068727		Standard	1,23	DC_8772	C_841337	32.9 Pounds	2.05 ActCube	11.13 Cubic Feet
8772_219545_20180807_98296_127068750		Standard	1,16	DC_8772	C_219545	3.2 Pounds	0.12 ActCube	4.32 Cubic Feet
8772_753553_20180807_98290_127068802		Standard	1,13	DC_8772	C_753553	0.8 Pounds	0.04 ActCube	1.08 Cubic Feet
8772_848921_20180807_98291_127068817		Standard	1,21	DC_8772	C_848921	33.5 Pounds	2.12 ActCube	9.22 Cubic Feet
8772_212190_20180807_98287_127068896		Standard	1,15	DC_8772	C_212190	0.1 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_840045_20180807_98286_127068904		Standard	1,26	DC_8772	C_840045	23.5 Pounds	1.3 ActCube	7.31 Cubic Feet
8772_840103_20180807_98290_127068913		Standard	1,22	DC_8772	C_840103	50.2 Pounds	2.4 ActCube	11.38 Cubic Feet
8772_751777_20180807_98285_127068989		Standard	1,27	DC_8772	C_751777	9.5 Pounds	0.72 ActCube	7.58 Cubic Feet
8772_743747_20180807_98288_127070091		Standard	1,24	DC_8772	C_743747	20.8 Pounds	1.22 ActCube	8.39 Cubic Feet
8772_857919_20180807_98283_127070149		Standard	1,19	DC_8772	C_857919	31.8 Pounds	1.65 ActCube	10.3 Cubic Feet
8772_891728_20180807_98282_127070187		Standard	1,20	DC_8772	C_891728	24.2 Pounds	1.32 ActCube	8.39 Cubic Feet

## Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref No	Handler	Comments	Created By	Created On
23092362	Tender Offer	Current	8/7/18 04:58 EDT				No comments	McKesson	8/7/18 04:58 EDT
23092364	Tender Accept	Current	8/7/18 04:58 EDT				No comments	McKesson	8/7/18 04:58 EDT
23092376	Arrival	Current	8/7/18 04:57 EDT				No comments	AUTODLVR	8/7/18 04:57 EDT

Add Multiple Add Single

## Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

## Web Tender Response

Status	Delivered	Comments to Shipper
Response	Accept	
Deadline		
Time Remaining		
Carrier Code	SSDD	
Response By	Manhattan Associates	
Responded On	8/7/18 04:58 EDT	

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MC-WV-00451.00166

Menu Actions Tools Bill Knoble Manhattan Associates

Shipment Details Events | All

Shipment ID CS0874060 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-to Information  
Load At New Castle Consignee RITE AID 7825  
DC 8772 C 574345  
2798 New Butler Rd 201 DEVINE DR  
New Castle, PA 16101 United States WEXFORD, PA 15090 United States

Carrier 347.92 USD Product Class Standard  
Equipment Carrier Ref  
Service Level Courier PO Number  
8772\_074778\_20180809\_99448, 8772\_128869\_20180809\_99448, 8772\_129996\_20180809\_99448, 8772\_163569\_20180809\_99448, 8772\_183730\_20180809\_99448, 8772\_176859\_20180809\_99443, 8772\_176859\_20180809\_99430, 8772\_185251\_20180809\_99448, 8772\_185895\_20180809\_99441, 8772\_186539\_20180809\_99440, 8772\_207899\_20180809\_99439, 8772\_218257\_20180809\_99442, 8772\_218901\_20180809\_99437, 8772\_219545\_20180809\_99429, 8772\_229098\_20180809\_99438, 8772\_229903\_20180809\_99433, 8772\_607528\_20180809\_99460, 8772\_574345\_20180809\_99416, 8772\_574345\_20180809\_99416, 8772\_686945\_20180809\_99433, 8772\_728825\_20180809\_99433, 8772\_739203\_20180809\_99417, 8772\_739203\_20180809\_99417, 8772\_742105\_20180809\_99444, 8772\_743747\_20180809\_99433, 8772\_743747\_20180809\_99421, 8772\_751777\_20180809\_99418, 8772\_763553\_20180809\_99443, 8772\_769496\_20180809\_99431, 8772\_840045\_20180809\_99419, 8772\_840103\_20180809\_99423, 8772\_841337\_20180809\_99442, 8772\_846921\_20180809\_99418, 8772\_846921\_20180809\_99424, 8772\_850352\_20180809\_99421, 8772\_850352\_20180809\_99442, 8772\_856630\_20180809\_99420, 8772\_857819\_20180809\_99428, 8772\_862058\_20180809\_99428, 8772\_851726\_20180809\_99437, 8772\_851729\_20180809\_99425

Mode COUR Distance 132 MI  
Commodity Commodities Weight 457.5 LBS  
Class  
Special Handling Standard Quantity 23.58 ActCubes  
Hazard No Volume 194.93 Cu Ft  
Perishable No Comments No comments  
Billing Method Collect Event Indicator

Event Notification Indicator  
Detention List  
Static Route Id 8772\_101  
Order Type Regular

Steps

003  
011  
015  
017  
018

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start Arrival End	Departure Start Departure End	Handler Orders	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/9/18 12:00 EDT 8/9/18 19:14 EDT	8/9/18 12:00 EDT 8/9/18 19:14 EDT	35 Orders	I Co
2	C 507528 CONNECTED HEALTH PHARMACY	CONNECTED HEALTH PHARMACY - 12620 PERRY HIGHWAY WEXFORD, PA 15090 United States	DL		8/9/18 01:00 EDT 8/9/18 19:47 EDT	8/9/18 01:00 EDT 8/9/18 19:47 EDT	1 Order	I Co
3	C 074778 AHN WP PHS	AHN WP PHS - 12311 PERRY HIGHWAY WEXFORD, PA 15090 United States	DL		8/9/18 01:00 EDT 8/9/18 19:47 EDT	8/9/18 01:00 EDT 8/9/18 19:47 EDT	1 Order	No cor
4	C 128869 WEXFORD SURGERY CENTER	WEXFORD SURGERY CENTER - 12311 PERRY HIGHWAY WEXFORD, PA 15090 United States	DL		8/9/18 01:00 EDT 8/9/18 19:47 EDT	8/9/18 01:00 EDT 8/9/18 19:47 EDT	1 Order	No cor
5	C 742105 PEACEHEALTH SOUTHWEST	PEACEHEALTH SOUTHWEST - 3000 ERICSSON DR STE 100 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
6	C 129996 PHARMBLUE LLC	PHARMBLUE LLC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
7	C 183599 CARACOLE INC	CARACOLE INC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
8	C 193730 RURAL AIDS ACTION COMM	RURAL AIDS ACTION COMM - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
9	C 175909 SOMEONE CARES INC OF ATL	SOMEONE CARES INC OF ATL - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
10	C 185251 PHARMBLUE LLC/AIDS CR PHS	PHARMBLUE LLC/AIDS CR PHS - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
11	C 185995 BRIDGING ACCESS TO CARE	BRIDGING ACCESS TO CARE - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
12	C 186539 AIDS DELAWARE INC	AIDS DELAWARE INC - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
13	C 207899 FAM & MED COUNSELING CNTR	FAM & MED COUNSELING CNTR - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
14	C 218257 UNITY WELLNESS CENTER	UNITY WELLNESS CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
15	C 219901 BEBASHI TRANSITION TO HPE	BEBASHI TRANSITION TO HPE - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
16	C 225903 WESTERN NC AIDS PROJECT	WESTERN NC AIDS PROJECT - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
17	C 225903 OUTPATIENT MEDICAL CENTER	OUTPATIENT MEDICAL CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
18	C 698945 LGBT LIFE CENTER	LGBT LIFE CENTER - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:02 EDT 8/9/18 19:49 EDT	8/9/18 01:02 EDT 8/9/18 19:49 EDT	1 Order	No cor
19	C 729825 HUDSON VALLEY COMM SVCS	HUDSON VALLEY COMM SVCS - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15080 United States	DL		8/9/18 01:12 EDT 8/9/18 19:59 EDT	8/9/18 01:12 EDT 8/9/18 20:09 EDT	1 Order	No cor

★ Consolidation removed email 8-30-18

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MC-WV-00451.00168

20	C 753553 KENT SUSSEX COMM HOSP	KENT SUSSEX COMM HOSP - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15088 United States	2	DL	8/9/18 01:22 EDT	8/9/18 01:22 EDT	1 Order	1 Co
21	C 702486 WESTRN NCAROLINA AIDS PROJ	WESTRN NCAROLINA AIDS PROJ - 40 PENNWOOD PL STE 300 WARRENDALE, PA 15088 United States	2	DL	8/9/18 01:22 EDT	8/9/18 01:32 EDT	1 Order	No cor
22	C 175659 RX BLUESTAR/ACTON/ID PHS	RX BLUESTAR/ACTON/ID PHS - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15088 United States	2	DL	8/9/18 01:32 EDT	8/9/18 01:32 EDT	1 Order	No cor
23	C 212645 OPEN DOOR OF GRTR ELGIN	OPEN DOOR OF GRTR ELGIN - 40 PENNWOOD PL STE 200 WARRENDALE, PA 15088 United States	2	DL	8/9/18 01:32 EDT	8/9/18 01:32 EDT	1 Order	No cor
24	C 862058 RITE AID 10953	RITE AID 10953 - 1130 PERRY HWY PITTSBURGH, PA 15237 United States	2	DL	8/9/18 01:45 EDT	8/9/18 01:45 EDT	1 Order	1 Co
25	C 850252 RITE AID 10929	RITE AID 10929 - 3730 BRIGHTON RD PITTSBURGH, PA 15212 United States	2	DL	8/9/18 02:06 EDT	8/9/18 02:06 EDT	1 Order	1 Co
26	C 857919 RITE AID 10940	RITE AID 10940 - 513 PERRY HWY PITTSBURGH, PA 15229 United States	2	DL	8/9/18 02:21 EDT	8/9/18 02:21 EDT	1 Order	1 Co
27	C 891729 RITE AID 11916	RITE AID 11916 - 4770 MCKNIGHT RD PITTSBURGH, PA 15237 United States	2	DL	8/9/18 02:26 EDT	8/9/18 02:26 EDT	1 Order	1 Co
28	C 849921 RITE AID 10920	RITE AID 10920 - 535 LINCOLN AVE PITTSBURGH, PA 15202 United States	2	DL	8/9/18 02:42 EDT	8/9/18 02:42 EDT	1 Order	1 Co
29	C 840103 RITE AID 10905	RITE AID 10905 - 1761 DUNCAN AVE ALLISON PARK, PA 15101 United States	2	DL	8/9/18 03:03 EDT	8/9/18 03:03 EDT	1 Order	1 Co
30	C 841337 RITE AID 10909	RITE AID 10909 - 1710 MT ROYAL BLVD GLENSHAW, PA 15116 United States	2	DL	8/9/18 03:34 EDT	8/9/18 03:34 EDT	1 Order	1 Co
31	C 743747 RITE AID 1944	RITE AID 1944 - 500 MOUNT ROYAL BLVD PITTSBURGH, PA 15223 United States	2	DL	8/9/18 03:39 EDT	8/9/18 03:39 EDT	1 Order	1 Co
32	C 850630 RITE AID 10938	RITE AID 10938 - 860 BUTLER ST PITTSBURGH, PA 15223 United States	2	DL	8/9/18 03:42 EDT	8/9/18 03:42 EDT	1 Order	1 Co
33	C 840045 RITE AID 10994	RITE AID 10994 - 4960 WILLIAM FLYNN HWY 10 ALLISON PARK, PA 15101 United States	2	DL	8/9/18 03:51 EDT	8/9/18 03:51 EDT	1 Order	1 Co
34	C 751777 WAL-MART 2803	WAL-MART 2803 - 300 WALMART DR GIBSONIA, PA 15044 United States	2	DL	8/9/18 04:03 EDT	8/9/18 04:03 EDT	1 Order	1 Co
35	C 735209 RITE AID 7832	RITE AID 7832 - 4155 EWALT RD GIBSONIA, PA 15044 United States	2	DL	8/9/18 04:05 EDT	8/9/18 04:05 EDT	1 Order	1 Co
36	C 574345 RITE AID 7825	RITE AID 7825 - 301 DEVINE DR WEXFORD, PA 15090 United States	2	DL	8/9/18 04:13 EDT	8/9/18 04:13 EDT	1 Order	1 Co

## Order List

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_175659_20180809_99443_127218915		Standard	1,9	DC_8772	C_175659	0.3 Pounds	0.02 ActCube	2.18 Cubic Feet
8772_218257_20180809_99438_127218949		Standard	1,14	DC_8772	C_218257	0.3 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_128869_20180809_99448_127218973		Standard	1,4	DC_8772	C_128869	2.8 Pounds	0.08 ActCube	1.08 Cubic Feet
8772_185251_20180809_99442_127218978		Standard	1,10	DC_8772	C_185251	2.4 Pounds	0.18 ActCube	3.24 Cubic Feet
8772_129998_20180809_99448_127218980		Standard	1,6	DC_8772	C_129998	8.8 Pounds	3.48 ActCube	15.85 Cubic Feet
8772_183730_20180809_99444_127217000		Standard	1,8	DC_8772	C_183730	1.1 Pounds	0.05 ActCube	3.24 Cubic Feet
8772_195895_20180809_99441_127217035		Standard	1,11	DC_8772	C_195895	1.4 Pounds	0.08 ActCube	2.18 Cubic Feet
8772_183589_20180809_99445_127217075		Standard	1,7	DC_8772	C_183589	35.9 Pounds	1.73 ActCube	0.22 Cubic Feet
8772_074778_20180809_99440_127217110		Standard	1,3	DC_8772	C_074778	4.6 Pounds	0.34 ActCube	3.24 Cubic Feet
8772_229098_20180809_99439_127217177		Standard	1,16	DC_8772	C_229098	15.2 Pounds	0.81 ActCube	8.48 Cubic Feet
8772_862058_20180809_99428_127217231		Standard	1,24	DC_8772	C_862058	18.1 Pounds	0.81 ActCube	7.31 Cubic Feet
8772_574345_20180809_99416_127217325		Standard	1,36	DC_8772	C_574345	30.7 Pounds	1.81 ActCube	11.38 Cubic Feet
8772_175659_20180809_99430_127217408		Standard	1,22	DC_8772	C_175659	5.5 Pounds	0.27 ActCube	3.24 Cubic Feet
8772_739203_20180809_99417_127217414		Standard	1,35	DC_8772	C_739203	19.4 Pounds	1.09 ActCube	7.31 Cubic Feet
8772_850352_20180809_99427_127217421		Standard	1,25	DC_8772	C_850352	21.3 Pounds	1.24 ActCube	10.3 Cubic Feet
8772_186539_20180809_99440_127217482		Standard	1,12	DC_8772	C_186539	5.8 Pounds	0.35 ActCube	2.18 Cubic Feet
8772_896945_20180809_99434_127217496		Standard	1,18	DC_8772	C_896945	6.5 Pounds	0.34 ActCube	5.4 Cubic Feet
8772_507528_20180809_99450_127217516		Standard	1,2	DC_8772	C_507528	1.2 Pounds	0.07 ActCube	1.08 Cubic Feet
8772_207899_20180809_99439_127217531		Standard	1,13	DC_8772	C_207899	2.5 Pounds	0.12 ActCube	2.18 Cubic Feet
8772_218901_20180809_99437_127217538		Standard	1,15	DC_8772	C_218901	20 Pounds	1.07 ActCube	8.84 Cubic Feet
8772_856630_20180809_99420_127217543		Standard	1,32	DC_8772	C_856630	8.5 Pounds	0.5 ActCube	5.15 Cubic Feet
8772_229903_20180809_99435_127217574		Standard	1,17	DC_8772	C_229903	0.3 Pounds	0.01 ActCube	2.18 Cubic Feet
8772_841337_20180809_99422_127217585		Standard	1,30	DC_8772	C_841337	9.2 Pounds	0.43 ActCube	4.32 Cubic Feet
8772_219545_20180809_99429_127217611		Standard	1,23	DC_8772	C_219545	30.1 Pounds	1.85 ActCube	12.48 Cubic Feet
8772_789468_20180809_99431_127217657		Standard	1,21	DC_8772	C_789468	1.5 Pounds	0.04 ActCube	1.08 Cubic Feet
8772_753553_20180809_99432_127217681		Standard	1,20	DC_8772	C_753553	0.7 Pounds	0.03 ActCube	3.24 Cubic Feet
8772_849921_20180809_99424_127217675		Standard	1,28	DC_8772	C_849921	19.2 Pounds	1.12 ActCube	10.76 Cubic Feet
8772_840045_20180809_99419_127217763		Standard	1,33	DC_8772	C_840045	14.8 Pounds	0.82 ActCube	7.31 Cubic Feet
8772_742105_20180809_99417_127217790		Standard	1,5	DC_8772	C_742105	0.1 Pounds	0.01 ActCube	1.08 Cubic Feet
8772_840103_20180809_99423_127217774		Standard	1,29	DC_8772	C_840103	21.2 Pounds	1.44 ActCube	10.3 Cubic Feet
8772_751777_20180809_99418_127217847		Standard	1,34	DC_8772	C_751777	8.3 Pounds	0.78 ActCube	7.58 Cubic Feet
8772_728825_20180809_99433_127217870		Standard	1,19	DC_8772	C_728825	0.6 Pounds	0.03 ActCube	1.08 Cubic Feet
8772_743747_20180809_99421_127217809		Standard	1,31	DC_8772	C_743747	23.1 Pounds	0.91 ActCube	6.39 Cubic Feet
8772_857919_20180809_99420_127218090		Standard	1,26	DC_8772	C_857919	20.6 Pounds	1.3 ActCube	5.98 Cubic Feet
8772_891729_20180809_99425_127218021		Standard	1,27	DC_8772	C_891729	15.7 Pounds	0.8 ActCube	7.31 Cubic Feet

## Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23058845	Tender Offer	Current	8/9/18 04:52 EDT				No comments	McKesson	8/9/18 04:52 EDT
23058846	Tender Accept	Current	8/9/18 04:52 EDT				No comments	McKesson	8/9/18 04:52 EDT
23058844	Arrival	Current	8/9/18 04:53 EDT				No comments	AUTODLVR	8/9/18 04:53 EDT

Add Multiple Add Single

## Alerts

Alert ID Type Alert Message Created On Acknowledged On Acknowledged By  
No alerts<https://lg.mckesson.com/ofr/ra/jsp/ShipmentDetails.jsp?previousPage=webTenders&shipm...> 8/30/2018

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MCKMDL00652042

MC-WV-00451.00170

Menu Actions Tools Bill Knoble Manhattan Associates

**Shipment Details** Events | All Cr

Shipment ID CS07860911 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To [Bill-to Information](#)  
Load At New Castle Consignee BOSWELL PRESCRIPTION CTR  
DC 8772 C 254384  
2798 New Butler Rd 210 OHIO STREET  
New Castle, PA 16101 United States BOSWELL, PA 15531 United States

Carrier Charges 38.66 USD Product Class Standard  
Equipment Courier Camer Ref  
Service Level COUR PO Number 8772\_254384\_20180806\_94533, 8772\_825674\_20180806\_94534, 8772\_991204\_20180806\_94535  
Mode COUR Distance 137.1 MI  
Commodity Class Commodities Weight 1,065.7 LBS  
Special Handling Standard Quantity 44.57 ActCube  
Hazard No Volume 98.27 Cu Ft  
Packable No Comments No comments  
Billing Method Collect Event Indicator  
Event Notification Indicator  
Detention List  
Static Route Id 8772\_B81

Order Type Regular

**Stops**

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler Order	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	3 Orders	1 Co
2	C 991204 BOSWELL PHCY SERVICE	BOSWELL PHCY SERVICE - 131 SCHOOLHOUSE RD JENNERSTOWN PA 15547 United States	2		8/6/18 01:00 EDT	8/6/18 01:00 EDT	8/6/18 01:00 EDT	8/6/18 01:00 EDT	1 Order	1 Co
3	C 825674 BOSWELL PHARMACY INS	BOSWELL PHARMACY INS - 210 OHIO STREET BOSWELL PA 15531 United States	2		8/6/18 01:25 EDT	8/6/18 01:30 EDT	8/6/18 01:30 EDT	8/6/18 01:30 EDT	1 Order	1 Co
4	C 254384 BOSWELL PRESCRIPTION CTR	BOSWELL PRESCRIPTION CTR - 210 OHIO STREET BOSWELL PA 15531 United States	2		8/6/18 01:30 EDT	8/6/18 01:30 EDT	8/6/18 01:30 EDT	8/6/18 01:30 EDT	1 Order	1 Co

**Order List**

Order ID	Split Id	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_825674_20180806_94534_126990212		Standard	1,3	DC_8772	C_825674	264 Pounds	9.66 ActCube	18.10 Cubic Feet
8772_254384_20180806_94533_126990391		Standard	1,4	DC_8772	C_254384	14.2 Pounds	0.88 ActCube	8.23 Cubic Feet
8772_991204_20180806_94535_126990047		Standard	1,2	DC_8772	C_991204	787.5 Pounds	34.03 ActCube	75.85 Cubic Feet

**Tracking Messages**

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23019395	Tender Offer	Current	8/5/18 04:54 EDT				No comments	McKesson	8/5/18 04:54 EDT
23019400	Tender Accept	Current	8/5/18 04:54 EDT				No comments	McKesson	8/5/18 04:54 EDT
23019426	Arrival	Current	8/5/18 04:54 EDT				No comments	AUTODLVR	8/5/18 04:54 EDT

Add Multiple Add Single

**Alerts**

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

**Web Tender Response**

Status Delivered Comments to Shipper  
Response Accept  
Deadline  
Time Remaining  
Carrier Code SSDD  
Response By Manhattan Associates  
Responded On 8/5/18 04:54 EDT

<https://lg.mckesson.com/ofr/ra/jsp/ShipmentDetails.jsp?previousPage=webTenders&shinm...> 8/30/2018

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MCKMDL00652044

MC-WV-00451.00172

Menu Actions Tools Bill Knoble **Manhattan** Associates

**Shipment Details** External API

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Shipment ID: **CS0785332** Bill of Lading  
 Reference Nbr: Trailer Nbr  
 Tractor Nbr:

Shipper: McKesson Bill To: Bill-to Information  
 Load At: New Castle Consignee: **BOSWELL PRESCRIPTION CTR**  
 DC: 8772 C: 254364  
 2798 New Butler Rd 210 OHIO STREET  
 New Castle, PA 16101 United States BOSWELL, PA 15531 United States

Carrier Charges: **38.68 USD** Product Class: Standard  
 Equipment: Carrier Ref:  
 Service Level: Courier PO Number: 8772\_254364\_20180807\_96021, 8772\_825674\_20180807\_96022, 8772\_991204\_20180807\_96023  
 Mode: COUR Distance: 137.1 MI  
 Commodity Class: Commodities Weight: 865 LBS  
 Special Handling: Standard Quantity: 45.98 ActCube  
 Hazmat: No Volume: 107.78 CuFt  
 Perishable: No Comments: No comments  
 Billing Method: Collect Event Indicator:  
 Event Notification Indicator:  
 Detention List:  
 Static Route Id: **8772\_B81**

Order Type: Regular

**Stops**

Stop	Customer	Address	Dock P/O	Appointment	Arrival Start Arrival End	Departure Start Departure End	Transfer Order
1	<u>C: 8772</u> New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/7/18 12:00 EDT 8/7/18 20:20 EDT	8/6/18 12:00 EDT 8/7/18 20:20 EDT	3:00 1:00
2	<u>C: 991204</u> BOSWELL PHCY SERVICE	BOSWELL PHCY SERVICE 131 SCHOOLHOUSE RD JENNERSTOWN, PA 15547 United States	2		8/7/18 01:00 EDT 8/7/18 22:30 EDT	8/7/18 01:00 EDT 8/7/18 22:30 EDT	1:00 1:00
3	<u>C: 825674</u> BOSWELL PHARMACY INS	BOSWELL PHARMACY INS 210 OHIO STREET BOSWELL, PA 15531 United States	2		8/7/18 01:25 EDT 8/7/18 22:55 EDT	8/7/18 01:30 EDT 8/7/18 23:00 EDT	1:00 1:00
4	<u>C: 254364</u> BOSWELL PRESCRIPTION CTR	BOSWELL PRESCRIPTION CTR 210 OHIO STREET BOSWELL, PA 15531 United States	2		8/7/18 01:30 EDT 8/7/18 23:00 EDT	8/7/18 01:30 EDT 8/7/18 23:00 EDT	1:00 1:00

**Order List**

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_825674_20180807_96022_127068422		Standard	1.3	DC_8772	C_825674	102.4 Pounds	6.03 ActCube	13.58 Cubic Feet
8772_254364_20180807_96021_127068803		Standard	1.4	DC_8772	C_254364	22.3 Pounds	1.4 ActCube	8.14 Cubic Feet
8772_991204_20180807_96023_127068803		Standard	1.2	DC_8772	C_991204	740.3 Pounds	38.55 ActCube	86.05 Cubic Feet

**Tracking Messages**

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By Created On
23032505	Tender Offer	Current	8/7/18 04:59 EDT				No comments	McKesson 8/7/18 04:59 EDT
23032506	Tender Accept	Current	8/7/18 04:59 EDT				No comments	McKesson 8/7/18 04:59 EDT
23032520	Arrival	Current	8/7/18 04:59 EDT				No comments	AUTQDLVR 8/7/18 04:59 EDT

Add Multiple Add Single

**Alerts**

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

**Web Tender Response**

Status: Delivered Comments to Shipper  
 Response: Accept  
 Deadline:  
 Time Remaining:  
 Carrier Code: SDD  
 Response By: Manhattan Associates  
 Responded On: 8/7/18 04:59 EDT

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MC-WV-00451.00174

Web Tender | Manhattan Associates, Inc.

Page 1 of 1

Menu Actions Tools Bill Knoble

### Shipment Details

Shipment ID: CS07869730 Bill of Lading Reference Nbr: Trailer Nbr: Tractor Nbr:

Shipper: McKesson Load At: New Castle DC 8772 2798 New Butler Rd New Castle, PA 16101 United States

Bill To: [Bill-to Information](#) Consignee: BOSWELL PRESCRIPTION CTR C 254384 210 OHIO STREET BOSWELL, PA 15531 United States

Carrier Charges: 58.65 USD Product Class: Standard

Equipment: Courier Service Level: COUR Mode: Standard Commodity Class: Standard Special Handling: No Hazmat: No Penishable: No Billing Method: Collect Event Notification Indicator: Detention List: Static Route Id: 8772\_B81

Order Type: Regular

Equipment: Courier Service Level: COUR Mode: Standard Commodity Class: Standard Special Handling: No Hazmat: No Penishable: No Billing Method: Collect Event Notification Indicator: Detention List: Static Route Id: 8772\_B81

Order Type: Regular

#### Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handle Order
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/7/18 12:00 EDT	8/7/18 12:00 EDT	8/8/18 20:29 EDT	8/8/18 20:29 EDT	3 Order
2	C 991204 BOSWELL PHCY SERVICE	BOSWELL PHCY SERVICE - 131 SCHOOLHOUSE RD JENNERSTOWN PA 15547 United States	2		8/8/18 01:00 EDT	8/8/18 01:00 EDT	8/8/18 22:30 EDT	8/8/18 22:30 EDT	1 Order
3	C 825674 BOSWELL PHARMACY INS	BOSWELL PHARMACY INS - 210 OHIO STREET BOSWELL, PA 15531 United States	2		8/8/18 01:25 EDT	8/8/18 01:30 EDT	8/8/18 22:55 EDT	8/8/18 23:00 EDT	1 Order
4	C 254384 BOSWELL PRESCRIPTION CTR	BOSWELL PRESCRIPTION CTR - 210 OHIO STREET BOSWELL, PA 15531 United States	2		8/8/18 01:30 EDT	8/8/18 01:30 EDT	8/8/18 23:00 EDT	8/8/18 23:00 EDT	1 Order

#### Order List

Order ID	Split Id	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_825674_20180808_97653_127143670		Standard	1.3	DC_8772	C_825674	101.8 Pounds	0.73 ActCube	15.44 Cubic Feet
8772_254384_20180808_97652_127143643		Standard	1.4	DC_8772	C_254384	26.4 Pounds	1.5 ActCube	7.89 Cubic Feet
8772_991204_20180808_97654_127144095		Standard	1.2	DC_8772	C_991204	715 Pounds	33.72 ActCube	85.26 Cubic Feet

#### Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref. Nbr	Handler	Comments	Created By	Created On
23045453	Tender Offer	Current	8/8/18 04:50 EDT				No comments	McKesson	8/8/18 04:50 EDT
23045455	Tender Accept	Current	8/8/18 04:50 EDT				No comments	McKesson	8/8/18 04:50 EDT
23045522	Arrival	Current	8/8/18 04:51 EDT				No comments	AUTODLYR	8/8/18 04:51 EDT

Add Multiple Add Single

#### Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

#### Web Tender Response

Status: Delivered Response: Accept Deadline: Time Remaining: Carrier Code: SSDD Response By: Manhattan Associates Responded On: 8/8/18 04:50 EDT

Comments to Shipper:

<https://lg.mckesson.com/ofr/ra/isp/ShipmentDetails.isn?previousPage=webTenders&shnm> 8/30/2018

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MC-WV-00451.00175

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MCKMDL00652048

MC-WV-00451.00176

Menu Actions Tools Bill Knoble Manhattan Associates

Shipment Details Events | All Cr

Shipment ID CS07874127 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-to Information  
Load At New Castle Consignee BOSWELL PRESCRIPTION CTR  
DC 8772 C 254384  
2798 New Butler Rd 210 OHIO STREET  
New Castle, PA 16101 United States BOSWELL, PA 15531 United States

Carrier Charges 38.66 USD Product Class Standard  
Equipment Carrier Ref  
Service Level Courier PD Number 8772\_254384\_20180809\_98959\_8772\_825674\_20180809\_98960\_8772\_991204\_20180809\_98961\_8772\_991204\_20180809\_99263  
Mode COUR Distance 137.1 MI  
Commodity Class Commodities Weight 828.6 LBS  
Special Handling Standard Quantity 39.05 ActCube  
Hazard No Volume 103.7 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator

Event Notification Indicator  
Detention List  
Static Route Id 8772\_891

Order Type Regular

Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start Arrival End	Departure Start Departure End	Handler Order	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/9/18 12:00 EDT 8/9/18 20:29 EDT	8/9/18 12:00 EDT 8/9/18 20:29 EDT	3 Orders	
2	C 991204 BOSWELL PHCY SERVICE	BOSWELL PHCY SERVICE - 131 SCHOOLHOUSE RD JENNERSTOWN, PA 15547 United States	PU		8/9/18 01:00 EDT 8/9/18 22:30 EDT	8/9/18 01:00 EDT 8/9/18 22:30 EDT	1 Order	
3	C 825674 BOSWELL PHARMACY INS	BOSWELL PHARMACY INS - 210 OHIO STREET BOSWELL, PA 15531 United States	DL		8/9/18 01:25 EDT 8/9/18 22:55 EDT	8/9/18 01:30 EDT 8/9/18 23:00 EDT	1 Order	
4	C 254384 BOSWELL PRESCRIPTION CTR	BOSWELL PRESCRIPTION CTR - 210 OHIO STREET BOSWELL, PA 15531 United States	DL		8/9/18 01:30 EDT 8/9/18 23:00 EDT	8/9/18 01:30 EDT 8/9/18 23:00 EDT	1 Order	

Order List

Order ID	Split Id	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_825674_20180809_98960_127217280		Standard	1,3	DC 8772	C 825674	118 2 Pounds	5 8 ActCube	15 66 Cubic Feet
8772_254384_20180809_98959_127217459		Standard	1,4	DC 8772	C 254384	38 Pounds	1 79 ActCube	9 22 Cubic Feet
8772_991204_20180809_99263_127217723		Standard	1,2	DC 8772	C 991204	872 4 Pounds	31 46 ActCube	78 6 Cubic Feet

Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23058499	Tender Offer	Current	8/9/18 04:51 EDT				No comments	McKesson	8/9/18 04:51 EDT
23058499	Tender Accept	Current	8/9/18 04:51 EDT				No comments	McKesson	8/9/18 04:51 EDT
23058499	Arrival	Current	8/9/18 04:51 EDT				No comments	AUTOLVR	8/9/18 04:51 EDT

Add Multiple Add Single

Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

Web Tender Response

Status Delivered Comments to Shipper  
Response Accept  
Deadline  
Time Remaining  
Carrier Code SSDD  
Response By Manhattan Associates  
Responded On 8/9/18 04:51 EDT

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MC-WV-00451.00178

Menu Actions Tools Bill Kneble Manhattan Associates

Shipment Details Events | Alerts

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Shipment ID CS07878561 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-to Information  
Load At New Castle Consignee BOSWELL PRESCRIPTION CTR  
DC 8772 C 254364  
2798 New Butler Rd 210 OHIO STREET  
New Castle, PA 16101 United States BOSWELL, PA 15531 United States

Carrier Charges 38.66 USD Product Class Standard  
Equipment Carrier Ref  
Service Level Courier PO Number 8772\_254364\_20180810\_00695, 8772\_825674\_20180810\_00696, 8772\_991204\_20180810\_00697  
Mode COUR Distance 137.1 MI  
Commodity Class Commodities Weight 449.6 LBS  
Special Handling Standard Quantity 23.47 ActCube  
Hazard No Volume 83.83 Cuft  
Perishable No Comments No comments  
Billing Method Collect Event Indicator  
Event Notification Indicator  
Detention List  
Static Route Id 8772\_B01

Order Type Regular

*Handwritten: Tms 3, Paid 2*

Stops

Stop	Customer	Address	Dock P/D	Appointment	Arrival Start Arrival End	Departure Start Departure End	Header Options	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/9/18 12:00 EDT 8/10/18 20:29 EDT	8/9/18 12:00 EDT 8/10/18 20:29 EDT	3 Green	Co
2	C 991204 BOSWELL PHCY SERVICE	BOSWELL PHCY SERVICE - 131 SCHOOLHOUSE RD JENNERSTOWN, PA 15547 United States	2		8/10/18 01:00 EDT 8/10/18 22:30 EDT	8/10/18 01:00 EDT 8/10/18 22:30 EDT	1 Power	Co
3	C 825674 BOSWELL PHARMACY INS	BOSWELL PHARMACY INS - 210 OHIO STREET BOSWELL, PA 15531 United States	2		8/10/18 01:25 EDT 8/10/18 22:55 EDT	8/10/18 01:30 EDT 8/10/18 23:00 EDT	1 Power	Co
4	C 254364 BOSWELL PRESCRIPTION CTR	BOSWELL PRESCRIPTION CTR - 210 OHIO STREET BOSWELL, PA 15531 United States	2		8/10/18 01:30 EDT 8/10/18 23:00 EDT	8/10/18 01:30 EDT 8/10/18 23:00 EDT	1 Power	Co

Order List

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_825674_20180810_00696_127294023		Standard	1,3	DC_8772	C_825674	46.8 Pounds	3.2 ActCube	9.92 Cubic Feet
8772_254364_20180810_00695_127294108		Standard	1,4	DC_8772	C_254364	55.7 Pounds	2.89 ActCube	10.84 Cubic Feet
8772_991204_20180810_00697_127294450		Standard	1,2	DC_8772	C_991204	34.7 Pounds	17.38 ActCube	63.06 Cubic Feet

Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23971968	Tender Offer	Current	8/10/18 04:58 EDT				No comments	McKesson	8/10/18 04:58 EDT
23971969	Tender Accept	Current	8/10/18 04:58 EDT				No comments	McKesson	8/10/18 04:58 EDT
23971980	Arrival	Current	8/10/18 04:58 EDT				No comments	AUTODLVR	8/10/18 04:58 EDT

Add Multiple Add Single

Alerts

Alert ID Type Alert Message Created On Acknowledged On Acknowledged By  
No alerts

Web Tender Response

Status Delivered Comments to Shipper:  
Response Accept  
Deadline  
Time Remaining  
Carrier Code SSD0  
Response By Manhattan Associates  
Responded On 8/10/18 04:58 EDT

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MC-WV-00451.00180

Web Tender | Manhattan Associates, Inc.

Page 1 of 1

Menu Actions Tools Bill Knoble [Sign Out](#)

**Shipment Details** [Events](#) [All C](#)

Shipment ID CS07860921 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To [Bill-to Information](#)  
Load At New Castle Consignee UPMC/MCKEESPORT OUTPA PHS  
DC 8772 C\_107932  
2798 New Butler Rd 1500 5TH AVE  
New Castle, PA 16101 United States MCKEESPORT, PA 15132 United States

Carrier Charges 19.33 USD Product Class Standard  
Equipment Carrier Ref  
Service Level Courier PO Number 8772\_107932\_20180806\_94564, 8772\_419539\_20180806\_94565  
Mode COUR Distance 61.3 MI  
Commodity Class [Commodities](#) Weight 0.7 LBS  
Special Handling Standard Quantity 0.04 ActCube  
Hazard No Volume 3.24 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator  
Event Notification Indicator  
Detention List  
Static Route Id 8772\_H91  
Order Type Regular

*TMS 2  
Paid 1*

*\* Consolidation  
removed a mail  
8-30-18*

**Stops**

Stop	Customer	Address	Dock F/O	Appointment	Arrival Start	Arrival End	Departure Start	Departure End	Handler	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	8/5/18 12:00 EDT	1	
2	C_419539 CS UPMC/MCKEESPORT OP PH	CS UPMC/MCKEESPORT OP PH - 1500 FIFTH AVENUE MCKEESPORT, PA 15132 United States	2		8/6/18 01:00 EDT	8/6/18 01:00 EDT	8/6/18 01:00 EDT	8/6/18 01:00 EDT	1 Order	cor
3	C_107932 UPMCMCKEESPORT OUTPA PHS	UPMCMCKEESPORT OUTPA PHS - 1500 5TH AVE MCKEESPORT, PA 15132 United States	2		8/6/18 01:00 EDT	8/6/18 01:00 EDT	8/6/18 01:00 EDT	8/6/18 01:00 EDT	1 Order	cor

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**Order List**

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_107932_20180806_94564_126999472		Standard	1,3	DC_8772	C_107932	0.3 Pounds	0.01 ActCube	2.16 Cubic Feet
8772_419539_20180806_94565_126999809		Standard	1,2	DC_8772	C_419539	0.4 Pounds	0.03 ActCube	1.08 Cubic Feet

**Tracking Messages**

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23019412	Tender Offer	Current	8/5/18 04:54 EDT				No comments	McKesson	8/5/18 04:54 EDT
23019417	Tender Accept	Current	8/5/18 04:54 EDT				No comments	McKesson	8/5/18 04:54 EDT
23019487	Arrival	Current	8/5/18 04:54 EDT				No comments	AUTODLVR	8/5/18 04:54 EDT

[Add Multiple](#) [Add Single](#)

**Alerts**

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts.					

**Web Tender Response**

Status	Response	Deadline	Time Remaining	Carrier Code	Response By	Responded On	Comments to Shipper
Delivered	Accept			SSDD	Manhattan Associates	8/6/18 04:54 EDT	

<https://lg.mckesson.com/ofr/ra/isn/ShipmentDetails.isn?previousPage=webTenders&shinm> 8/30/2018

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MC-WV-00451.00182

Menu Actions Tools Bill Knobie Manhattan Associates

Shipment Details Events | All C

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Shipment ID CS07869744 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-to Information  
Load At New Castle Consigned ALLE-KISKI MEDICAL CTR  
DC 8772 C 018026  
2798 New Butler Rd 1301 CARLISLE ST  
New Castle, PA 16101 United States NATRONA HEIGHTS, PA 15065 United States

Carrier Charges 19.33 USD Product Class Standard  
Equipment Carrier Ref  
Service Level Courier PO Number 8772\_018026\_20180808\_97760, 8772\_678574\_20180808\_97761  
Mode COUR Distance 48.8 MI  
Commodity Class Commodities Weight 15.8 LBS  
Special Handling Standard Quantity 0.53 ActCube  
Hazard No Volume 5.15 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator  
Event Notification Indicator  
Detention List  
Static Route Id 8772\_295

Order Type Regular

TMS 2  
PAID 1

\* Consolidation  
removed encl  
8-30-18

Stops

Stop	Customer	Address	Dock PID	Appointment	Arrival Start Arrival End	Departure Start Departure End	Handler Orders	Co
1	DC 8772 New Castle	New Castle - 2798 New Butler Rd New Castle, PA 16101 United States	4		8/7/18 12:00 EDT 8/8/18 22:00 EDT	8/7/18 12:00 EDT 8/8/18 22:00 EDT	2 Orders	1 Co
2	C 878574 WEST PENN OP AVO PHS	WEST PENN OP AVO PHS - 1301 CARLISLE STREET NATRONA HEIGHTS, PA 15065 United States	2		8/8/18 01:00 EDT 8/8/18 22:56 EDT	8/8/18 01:00 EDT 8/8/18 22:56 EDT	1 Order	1 Co
3	C 018026 ALLE-KISKI MEDICAL CTR	ALLE-KISKI MEDICAL CTR - 1301 CARLISLE ST NATRONA HEIGHTS, PA 15065 United States	2		8/8/18 01:04 EDT 8/8/18 23:00 EDT	8/8/18 01:04 EDT 8/8/18 23:00 EDT	1 Order	No cor

Order List

Order ID	Spl Id	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_678574_20180808_97761_127143405		Standard	1,2	DC 8772	C 878574	1.9 Pounds	0.1 ActCube	3.24 Cubic Feet
8772_018026_20180808_97760_127143977		Standard	1,3	DC 8772	C 018026	13.9 Pounds	0.53 ActCube	1.91 Cubic Feet

Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23045492	Tender Offer	Current	8/8/18 04:50 EDT				No comments	McKesson	8/8/18 04:50 EDT
23045493	Tender Accept	Current	8/8/18 04:50 EDT				No comments	McKesson	8/8/18 04:50 EDT
23045523	Arrival	Current	8/8/18 04:51 EDT				No comments	AUTODLR	8/8/18 04:51 EDT

Add Multiple Add Single

Alerts

Alert ID Type Alert Message Created On Acknowledged On Acknowledged By  
No alerts

Web Tender Response

Status Delivered Comments to Shipper  
Response Accept  
Deadline  
Time Remaining  
Carrier Code SSDD  
Response By Manhattan Associates  
Responded On 8/8/18 04:50 EDT

<https://lg.mckesson.com/ofr/ra/isp/ShipmentDetails.isn?previousPage=webTenders&shnm> 8/30/2018

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Menu Actions Tools Bill Enable Sign Out

### Shipment Details

Events | All C

Shipment ID CS07874131 Bill of Lading  
Reference Nbr Trailer Nbr  
Tractor Nbr

Shipper McKesson Bill To Bill-to Information  
Load At New Castle Consignee UPMC/MCKEESPORT OUTPA PHS  
DC\_8772 C\_107832  
2758 New Butler Rd 1500 5TH AVE  
New Castle, PA 16101 United States MCKEESPORT, PA 15132 United States

Carrier Charges 19.33 USD Product Class Standard  
Equipment Carrier Rol  
Service Level Courier PO Number 8772\_107932\_20180809\_98991, 8772\_419539\_20180809\_98993, 8772\_731759\_20180809\_98992  
Mode COUR Distance 61.3 MI  
Commodity Class Commodities Weight 9.4 LBS  
Special Handling Standard Quantity 0.46 ActCube  
Hazard No Volume 6.23 CuFt  
Perishable No Comments No comments  
Billing Method Collect Event Indicator  
Event Notification Indicator  
Detention Lst  
Static Route Id 8772\_H91  
Order Type Regular

*ms 2  
paid 1*

#### Stops

Stop	Customer	Address	Dock P/O	Appointment	Arrival Start Arrival End	Departure Start Departure End	Handler Orders	Co
1	DC_8772 New Castle	New Castle - 2758 New Butler Rd New Castle, PA 16101 United States	4		8/9/18 12:00 EDT 8/9/18 21:41 EDT	8/9/18 12:00 EDT 8/9/18 21:41 EDT	1 3 Orders	1 Cor
2	C_419539 CS UPMC/MCKEESPORT OP PHY	PA 15132 United States	PU		8/9/18 01:00 EDT 8/9/18 22:50 EDT	8/9/18 01:00 EDT 8/9/18 22:50 EDT	No 1 Order	No cor
3	C_731759 CS UP DETOX-REHAB WAC A34	15132 United States	DL		8/9/18 01:00 EDT 8/9/18 23:00 EDT	8/9/18 01:00 EDT 8/9/18 23:00 EDT	No 1 Order	No cor
4	C_107832 UPMCMCKEESPORT OUTPA PHS	15132 United States	DL		8/9/18 01:10 EDT 8/9/18 23:00 EDT	8/9/18 01:10 EDT 8/9/18 23:00 EDT	No 1 Order	No cor

#### Order List

Order ID	Split ID	Protection Level	Stop Sequence	Origin	Destination	Weight	Quantity	Volume
8772_107932_20180809_98991_127217541		Standard	1,4	DC_8772	C_107832	1.1 Pounds	0.06 ActCube	3.24 Cubic Feet
8772_419539_20180809_98993_127217892		Standard	1,2	DC_8772	C_419539	8 Pounds	0.38 ActCube	1.91 Cubic Feet
8772_731759_20180809_98992_127218901		Standard	1,3	DC_8772	C_731759	0.3 Pounds	0.02 ActCube	1.06 Cubic Feet

#### Tracking Messages

Message ID	Type	Status	Time Location	Reason Code	Carrier Ref Nbr	Handler	Comments	Created By	Created On
23058500	Tender Offer	Current	8/9/18 04:51 EDT				No comments	McKesson	8/9/18 04:51 EDT
23058507	Tender Accept	Current	8/9/18 04:51 EDT				No comments	McKesson	8/9/18 04:51 EDT
23086554	Arrival	Current	8/9/18 04:51 EDT				No comments	AUTODLVR	8/9/18 04:51 EDT

Add Multiple Add Single

#### Alerts

Alert ID	Type	Alert Message	Created On	Acknowledged On	Acknowledged By
No alerts					

#### Web Tender Response

Status	Response	Deadline	Time Remaining	Carrier Code	Response By	Responded On
Delivered	Accept			SSDD	Manhattan Associates	8/9/18 04:51 EDT

Comments to Shipper

<https://lg.mckesson.com/ofr/ra/jsp/ShipmentDetails.jsp?previousPage=webTenders&shipm...> 8/30/2018

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

INDEX.1

Adjustments, 55-73

Alarm System, 55-28

## ARCOS

Balancing reports, 55-105

Central reporting identifier  
number, 55-114

DEA error reports, 55-108

Definition, 55-9

Discrepancy report, 55-112

Edit program, 55-112

Elimination of non-reportable  
items, 55-108

Error corrections, 55-106

Key-entry, 55-102

Month-end reports, 55-105

Products covered, 55-10

Receiving, 55-63

Reports, 55-102

Returns, 55-66, 55-75

## Audit

Areas of examination, 55-5

DEA, 55-125

Definition, 55-2

Employee background  
investigation, 55-24

Law Department, 55-127

Quarterly DEA checklist,  
55-127

Backorders, 55-69

Breakage reports, 55-117

## Cage

Access, 55-24

Control, 55-29

Security, 55-4

Specifications, 55-21

Walk tests, 55-27

## Carriers

Facsimile order forms, 55-87

Form 222, 55-86, 55-88

Return items, 55-64

Security, 55-25

Selection of, 55-118

Central records, 55-58

Central reporting identifier  
number, 55-114

Change of location, 55-15

Computer room, 55-102

Consent to Inspect, 55-8

Continuing education, 55-36

## Controlled substances

Backorders, 55-69

Breakage reports, 55-117

Carriers, 55-30, 55-118

DEA request, 55-78

Discontinuance or transfer of  
business, 55-119

Disposal, 55-116

Diversion, 55-130

Doctor orders, 55-76

Item coding, 55-61

Losses, 55-77, 55-117

Mail, 55-27, 55-121

NDC number change, 55-121

New item, 55-60

Order filling, 55-29, 55-36,  
55-68, 55-85

Physical security, 55-18

Receiving, 55-28, 55-61

Returns, 55-64, 55-67

Security, 55-21

Shortages, 55-73, 55-74,  
55-103

Storage, 55-20, 55-21, 55-22

Unsolicited returns, 55-67

Will call, 55-26, 55-87

Controlled Substances Act, 55-7

Count sheets, 55-48

File retention, 55-52

Customer File, 55-33

Customer registration, 55-31

Chain stores, 55-31

Expired, 55-35

## DEA

ARCOS Unit address, 55-8

Audit, 55-125

Deactivated certificates,  
55-34Employee background  
investigation, 55-24

Expiration report, 55-31

Field Division Offices, 55-16

Registration, 55-32

Request for controlled  
substance, 55-78

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

INDEX.2

Security requirements, 55-18  
 Discontinuance or transfer of business, 55-119  
 Disposal of controlled substances, 55-116  
 Diversion  
     Chemical Diversion & Trafficking Act of 1988, 55-130  
     Import/export, 55-132  
     Listed chemicals, 55-130  
     Penalties, 55-132  
     Recordkeeping, 55-131  
     Records retention, 55-131  
     Reporting requirements, 55-132  
 Dosage units, 55-2  
 Drop shipments, 55-76  
 Emergency orders, 55-44  
 Employee background investigation, 55-23  
 Endorsement of order forms, 55-88  
 Expiration dates, 55-34  
 Expiration Report, 55-31  
 Expired certificate, 55-35, 55-36  
 Facsimile copies  
     Carriers, 55-87  
     Order filling, 55-86, 55-88  
 Form 106, 55-74, 55-77, 55-104, 55-117, 55-118  
 Form 222, 55-4, 55-10, 55-26, 55-32, 55-43, 55-44, 55-55, 55-56, 55-57, 55-60, 55-62, 55-63, 55-66, 55-67, 55-68, 55-69, 55-70, 55-73, 55-80, 55-83, 55-84, 55-85, 55-86, 55-87, 55-88, 55-92, 55-93, 55-97, 55-98, 55-100  
     Absence of, 55-44  
     Adjustments/customer credits, 55-73  
     Backorders, 55-69  
     Canceled line, 55-90  
     Carriers, 55-86, 55-88  
     Defective/unacceptable, 55-89  
     Different versions, 55-83  
     Doctor orders, 55-122  
     Execution, 55-85  
     Expired, 55-100  
     Facsimiles, 55-86  
     Failure to complete, 55-80  
     Improperly prepared, 55-84  
     Key-entry, 55-104  
     Last Line Completed, 55-83  
     Law enforcement request, 55-78  
     National Buying Center, 55-97, 55-98  
     Number of Items Ordered, 55-83  
     Power of Attorney, 55-95  
     Preservation, 55-98  
     Product returns, 55-66, 55-75  
     Regulations, 55-80  
     Retained by DC, 55-97  
     Review of, 55-87, 55-92, 55-93  
     Roman numerals, 55-84  
     Scheduled drug registration, 55-32, 55-36  
     Shipping date, 55-72  
     Unexecuted forms, 55-97  
     Unsolicited returns, 55-67  
     Voided, 55-98  
     Voided line, 55-90  
 Form 222a, 55-82  
 Form 223, 55-12, 55-33  
 Form 225, 55-12, 55-13, 55-15  
 Form 225a, 55-14, 55-15  
 Form 333, 55-47, 55-76, 55-109, 55-110, 55-111, 55-118  
     OCR, 55-109  
 Form 41, 55-77, 55-103, 55-116, 55-117  
 Form 84, 55-1, 55-8  
 Government contact, report of, 55-9, 55-125  
 Government destruction/seizure, 55-77  
 HOSS, 55-33, 55-61  
 Inspections  
     Authority, 55-23  
     Authority to inspect, 55-8  
     Consent, 55-8  
     DEA, 55-1  
     DEA Administrative, 55-8  
     Exclusions, 55-8  
     Frequency, 55-9  
 Inventory

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

## INDEX.3

Annual, 55-46, 55-47  
 Biennial, 55-3, 55-47  
 Controlled substances, 55-5  
 Initial, 55-46  
 Listing procedures, 55-48  
 Monthly, 55-46, 55-47  
 Physical, 55-2  
 Post inventory procedures, 55-52  
 Semi-annual, all products, 55-53  
 Item substitution, 55-91  
 Locker inspections, 55-25  
 Mail orders  
     Incoming, 55-82  
     Post office box, 55-27  
     Postal regulations, 55-121  
 National Buying Center  
     DEA Certificate, 55-12  
     Form 222, 55-98  
 NDC number change, 55-121  
 Order filling  
     Adjustments and credits, 55-73  
     Backorders, 55-69  
     Carriers, 55-86  
     Controlled substances, 55-29  
     Drop shipments, 55-76  
     Emergency orders, 55-44  
     Endorsing order forms, 55-88  
     Facsimile copies, 55-86, 55-88  
     Form, 55-68, 55-80, 55-85  
     Government  
         destruction/seizure, 55-77  
     Mail, 55-121  
     Post office box, 55-27  
     Power of Attorney, 55-94  
     Procedures, 55-85  
     Returns, 55-74  
     Shipping & receiving, 55-30  
     Suspicious orders, 55-38, 55-43  
     Telephone, 55-5  
     Will call, 55-26, 55-87  
 Order form  
     Audit, 55-4  
     Cancellation and voiding, 55-99  
     DEA guidelines, 55-92  
     Endorsement, 55-88  
     Lost or stolen forms, 55-96  
     Procedure for obtaining, 55-81  
     Procedures for completing, 55-83  
     Regulations, 55-80  
     Retention, 55-98  
     Unaccepted/defective forms, 55-89, 55-93  
     Unused, 55-99  
 Pick Department JB, 55-10, 55-53  
 Pick Department JE, 55-10, 55-53  
 Post office box, 55-27  
 Power of Attorney, 55-13, 55-94  
 Purchase order records, 55-60  
 Quarterly DEA checklist, 55-127  
 Re-registration  
     Application, 55-14  
     Change of location, 55-15  
     Fee, 55-14  
     Form, 55-14, 55-15  
     Frequency, 55-14  
     Procedures, 55-14  
 Receiving records, 55-61  
 Records retention, 55-2  
     Exceptions, 55-57  
 Refrigerated substances, 55-20  
 Registration  
     Central records, 55-58  
     Change of location, 55-15  
     Customer, 55-31  
     DEA inspection, 55-5  
     Expiration dates, 55-34  
     Expired certificate, 55-35  
     Fee, 55-12, 55-13  
     Forms, 55-12  
     Frequency, 55-14  
     Incomplete RXDA schedules, 55-32  
     National Buying Center, 55-12  
     Procedures, 55-12  
     Purchase order records, 55-46, 55-60  
     Re-registration, 55-14  
     Recordkeeping, 55-55  
     Records, 55-55

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES 1/97

INDEX.4

Registration number, 55-55  
 Registration number, 55-3, 55-12, 55-35, 55-55  
 Regulatory requirements, 55-7  
 Return credits, 55-64  
 Returns, 55-64, 55-74  
 RXDA incomplete schedules, 55-32  
 Safe specifications, 55-18  
 Sales and distribution, 55-68  
 Schedule II controlled substances  
     Storage, 55-20  
 Section 880, 55-1  
 Security, 55-3  
     Alarm system, 55-28  
     Cage, 55-4, 55-24, 55-27, 55-29  
     Carriers, 55-25  
     Controlled substances, 55-18, 55-21, 55-28, 55-29  
     Customer registration, 55-31  
     DEA requirements, 55-18  
     Employee access, 55-23, 55-24, 55-25  
     Employee background investigation, 55-23  
     Internal controls, 55-23  
     Locker inspections, 55-25  
     Management, 55-23  
     McKesson requirements, 55-18, 55-23  
     Non-controlled items, 55-23  
     Packages and handbags, 55-26  
     Physical, 55-18  
     Refrigerated, 55-20  
     Safe, 55-18  
     Service & repair personnel, 55-25  
     Shipping & receiving, 55-25, 55-30  
     Summary of requirements, 55-23  
     Vault, 55-18, 55-24, 55-27, 55-29  
     Visitors, 55-24  
     Walk tests, 55-27  
     Warehouse, 55-3, 55-24  
 Segregation of records, 55-4  
 Service & repair personnel, 55-25  
 Shipping & receiving, 55-25, 55-27, 55-28, 55-30, 55-36  
 Storage of controlled substances  
     Schedule II, 55-20  
     Schedule III-V, 55-22  
 Suspicious orders  
     Computer reports, 55-39  
     Detection, 55-38  
     Emergency orders, 55-44  
     Order fillers, 55-43  
     RAM's response, 55-43  
     Reporting, 55-40  
 U.S. Government Printing Office, 55-7  
 Unsolicited returns, 55-67  
 Vault  
     Access, 55-24  
     Control, 55-29  
     Security, 55-4  
     Specifications, 55-18  
     Walk tests, 55-27  
 Visitor security, 55-24  
 Walk tests, 55-27  
 Warehouse security, 55-3, 55-24  
 Will call, 55-26, 55-87

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## DRUG OPERATIONS MANUAL

## 55-CONTROLLED SUBSTANCES

PAGE 55-144:EXHIBITS.1

## EXHIBITS LOG

EXHIBIT	DESCRIPTION	PAGE
55-1	DEA Form 225, New Application for Registration	55-12
55-2	DEA Form 225a, Renewal Application for DEA Registration	55-15
55-3	5/1/74 memorandum from L.W. Willson: Refrigerated substances storage approval	55-21
55-3a	10/20/89 letter from DEA: Refrigerated substances storage approval	55-21
55-4	Power of Attorney For DEA Order Forms	55-95,96
55-4a	DR48R10A Customers With Expired DEA Numbers	55-32
55-5	11/10/80 letter from DEA: Suspicious orders	55-38
55-6	DR49R15A, Controlled Substances Sales Report	55-39
55-6a	DR49R25A, Controlled Substances Customer Purchases	55-39
55-7	DR46R35A and DR47R05A, Customer Recap and Detailed Variance reports	55-40,42
55-8	Suspicious Order Cover Letter	55-42
55-9	DEA Unusual Purchases Notifications log	55-43,43
55-10	DEA Form 222, Order Form-Schedules I & II	55-55,83
55-11	DEA Form 106, Report of Theft or Loss of Controlled Substances	55-77
55-12	DEA Order Form Guidelines	55-92
55-13	DEA Form 222, Order Form-Schedules I & II, completion instructions	55-93
55-14	DC DEA Form 222 Control Log	55-81,97,98
55-15	ARCOS Transmittal Sheet	55-102
55-16	DC monthly ARCOS transmission recap	55-108
55-17	DEA Form 333, ARCOS Transaction Reporting (OCR)	55-109,109
55-18	ARCOS Batch Control and Transaction Edit Errors	55-109
55-19	ARCOS Transaction Submission Control Form	55-114
55-20	Notice of Unacceptable Order Form	55-93,94
55-21	10/23/95 letter from DEA: Central Reporting Identifier Number	55-114
55-22	DEA Form 41, Registrants Inventory of Drugs Surrendered	55-77,116
55-23	ARCOS Correction Form	55-107
55-24	Quarterly DEA Checklist	55-128
55-25	ARCOS Physical Inventory Pre-list—First Count: completed sample	55-49,49
55-26	ARCOS Physical Inventory Pre-list—First, Second, and Consolidated Counts	55-49,50
55-27	ARCOS Physical Inventory Pre-list—First Count: case count completed sample	55-50
55-28	ARCOS Physical Inventory Pre-list—Consolidated Count: completed sample	55-51

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## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES PAGE 55-145:EXHIBITS.2

EXHIBIT	DESCRIPTION	PAGE
55-29	DEA Suspicious Order Threshold Amounts	55-131
55-30	Suspicious Order Guidelines	55-132
55-31	DT515R01, Customers With DEA Registrations With Incomplete RXDA Schedules	55-32
55-32	DM01R20A, Economost Transaction Audit Report	55-34
55-33	DEA Continuing Education Report	55-36
55-34	DEA Inspection Report	55-125,127
55-35	Visitor's Log & Consent to Search	55-24
55-36	DEA Walk Test Log	55-28
55-37	Alarm Log	55-28
55-38a	Letter from DEA: clarification of DEA Form 222 completion	55-83,91
55-38b	Letter from DEA: clarification of DEA Form 222 emergency orders and "No. of Items Ordered" errors	55-83
55-38c	9/14/95 letter from DEA: changes in DEA Form 222, "Last Line Completed"	55-84
55-39	Report of Government Contact	55-100,125
55-40	Employee Background Information Sheet	55-23
55-41	EPIC Bulletin Write Up Form for NDC Number change	55-121
55-42	DI11R05B, DEA Control Log Schedule II Narcotic	55-30
55-43	6/25/92 letter from DEA: acceptance of generic substitutions	55-91
55-44	Customer letter re DEA Form 222 completion instructions	55-94
55-45	DEA Regional Offices	55-16,41,42
55-46	DU45R05A, Daily Controlled Substance Suspicious Order Warning Report	55-39,41
55-47	DU45R05B, Monthly Controlled Substance Suspicious Purchases Report	55-40
55-48	7/18/96 letter from DEA: common/contract carriers; 8/28/96 letter from DEA: facsimile orders when using common/contract carriers; 10/28/96 letter from DEA: facsimile orders when using proprietary drivers	55-86,88
55-49	Monthly ARCOS Balancing	55-108
55-50	1/2/96 memorandum from Dan White: acceptance of previous year's date during January of each year; 12/21/96 letter from DEA: permission to accept orders with previous year's date during January of each year.	55-90
55-51	Expired Customer DEA Certificate "Renewal In Process" Verification Sheet	35
55-52	10/27/95 letter from DEA: written agreement between distributor and customer regarding generic substitutions	91

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Drug Operations Manual  
Exhibit 55-1, Page 1 of 2  
1/15/97

- Explanation for answering "Yes" to question(s) 7(b) and (c).

Applicants who have answered "Yes" to questions 7(b) and (c) are required to submit a statement explaining such response(s). The space provided below should be used for this purpose and must be separately signed.

PRINT or TYPE Name Here - Sign Below

Signature

Date

#### DEFINITIONS

1. Bulk, Synthesizer-Extractor. The term bulk manufacture means the production, preparation, propagation, compounding or processing of a drug or other substance, either directly or indirectly or by extraction from substances of natural origin, or independently by means of chemical synthesis or by combination of extraction and chemical synthesis, when the final product is to be used for further manufacture (into dosage forms) or a substance to be used for industrial purposes or for repackaging into non-dosage form units for patient or other uses.
2. Dosage Form Manufacture. Means the production, preparation, compounding or processing of a bulk substance into a form which is to be used without additional production, preparation, compounding or processing by an ultimate user; except that such term does not include packaging, repackaging, labeling, or relabeling of a drug or other substance, in conformity with applicable State or local law, by a practitioner as an incident to his administration or dispensing of a drug or substance in the course of his professional practice.
3. The term Repackager - Relabeler: Means the packaging or repackaging of a drug or other substance or the labeling or relabeling of its container, except that such term does not include the packaging, repackaging, labeling or relabeling of a drug or other substance, in conformity with applicable State or local law, by a practitioner as an incident to his administration or dispensing of a drug or substance in the course of his professional practice.
4. Non-Human Consumption: Means the production, preparation, propagation, compounding or processing of a drug or other substance whether directly or indirectly or by extraction of substances of natural origin or independently by means of chemical synthesis or by a combination of extraction and chemical synthesis, where the final product is not to be used for prevention, treatment or mitigation of diseases, but is to be used for scientific investigation, laboratory analysis, or other non-patient usage.
  - A. Industrial Manufacture: Means the use of Controlled Substances in the manufacture of non-drug, non-controlled finished product.
  - B. Mixing of a drug or other substance with radioactive material.

#### PRIVACY ACT INFORMATION

**AUTHORITY:** Section 302 and 303 of the Controlled Substances Act of 1970 (PL 91-513)

**PURPOSE:** To obtain information required to register applicants pursuant to the Controlled Substances Act of 1970 (PL 91-513)

**ROUTINE USES:** The Controlled Substances Act Registration Records produces special reports as required for statistical analytical purposes. Disclosures of information from this system are made to the following categories of users for the purposes stated:

- A. Other Federal law enforcement and regulatory agencies for law enforcement and regulatory purposes
- B. State and local law enforcement and regulatory agencies for law enforcement and regulatory purposes
- C. Persons registered under the Controlled Substances Act (PL 91-513) for the purpose of verifying the registration of customer practitioners

**EFFECT:** Failure to complete form will preclude processing of the appli

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Form DEA-225c (94)

**RENEWAL**  
Application for DEA Registration  
Under  
Controlled Substances Act of 1970

Read Instructions Before Completing  
Application

No registration may be issued unless a completed application  
form has been received (21 CFR 1301.32).

See "Privacy Act" Information on Reverse

**ATTENTION** 

REGISTRANT BUSINESS NAME AND ADDRESS

**MCKESSON DRUG COMPANY**  
3775 SEAPORT BLVD  
WEST SACRAMENTO, CA

OMB No. 1117-0012

95691

DEA  
REGISTRATION  
NUMBER

PM0021535

YOUR CURRENT  
REGISTRATION  
EXPIRES ON

01/31/96

\*THE FEE IS \$438. FOR 1 YEAR\*\*

Mail this Copy with FEE to:  
**U.S. Department of Justice**  
**Drug Enforcement Administration**  
**Central Station**  
**P.O. Box 28083**  
**Washington, D.C. 20038-8083**

For Information Call: (202) 307-7255

Make Check or Money Order Payable to:  
**Drug Enforcement Administration**  
in amount indicated.

**FEES ARE NOT REFUNDABLE.**

1. **DRUG SCHEDULES:** (Check all applicable schedules in which you intend to handle controlled substances. Complete Item 6 if applicable.)

☐ SCHEDULE I

☐ SCHEDULE II

☐ SCHEDULE III  
NARCOTIC

☐ SCHEDULE III  
NONNARCOTIC

☐ SCHEDULE IV

☐ SCHEDULE V

2. Supply any other current DEA Registration Numbers for any class of business activity at the address shown on this application.

3. **MANUFACTURERS ONLY**

Check Schedules & Category  
applicable in the boxes to the  
right.

**MANUFACTURER  
CATEGORIES**

- A ☐ Bulk, Synthesizer-Extractor  
B ☐ Dosage Form  
C ☐ Repacker-Relabeler  
D ☐ Non-Human Consumption

**SCHEDULE**

I	II	III	III-Non	IV	V

4. **ALL APPLICANTS MUST ANSWER THE FOLLOWING:**  
STATE LICENSE

(a) Are you currently authorized to prescribe, distribute, dispense, conduct research, or otherwise handle the  
controlled substances in the schedules for which you are applying, under the laws of the State or jurisdiction  
in which you are operating or propose to operate?

☐ Yes - State License Number \_\_\_\_\_

☐ Not applicable

☐ Yes - State Controlled Substance No. \_\_\_\_\_

☐ Not applicable

(b) Has the applicant ever been convicted of a crime in connection with controlled substances under State or Federal law, or ever  
surrendered or had a DEA registration revoked, suspended or denied, or ever had a State professional license or controlled  
substance registration revoked, suspended, denied, restricted or placed on probation? ☐ Yes ☐ No

(c) If the applicant is a corporation, association, or partnership, has any officer, partner, stockholder or proprietor been convicted of a  
crime in connection with controlled substances under State or Federal law, or ever surrendered or had a DEA registration revoked,  
suspended or denied, or ever had a State professional license or controlled substance registration revoked, suspended, denied,  
restricted or placed on probation? ☐ Yes ☐ No ☐ Not applicable

If the answer to questions 4 (b) or (c) is Yes, include a statement using the space provided on the REVERSE of this part.

Print or Type Name Here - Sign Below

Applicant's Business Phone No. (include Area Code) \_\_\_\_\_

**SIGN  
HERE**

Signature of Applicant or authorized individual \_\_\_\_\_

Date \_\_\_\_\_

TITLE (If the applicant is a corporation, institution, or other entity, enter Title of the person signing on behalf of the  
applicant (e.g., President, Dean, Procurement Officer, etc...))

5. **CERTIFICATION FOR FEE EXEMPTION**

☐ CHECK THIS BLOCK IF APPLICANT NAMED HEREON IS A FEDERAL, STATE, OR LOCAL  
GOVERNMENT OPERATED HOSPITAL OR INSTITUTION.

Individual researchers cannot be exempted from payment of fee. The undersigned  
hereby certifies that the applicant named hereon is a Federal, state, or local  
government operated hospital or institution, and is exempt from the payment of  
the application fee.

Signature of Certifying Official \_\_\_\_\_

Date \_\_\_\_\_

Print or Type Name \_\_\_\_\_

Print or Type Title \_\_\_\_\_

6. **DRUG CODE NUMBERS** must coincide with the schedules requested. Listed below are the Drug Code  
requirements for each business activity:

**Analytical Lab** - Not required to list drug codes

**Distributor** - Schedule I

**Exporter** - Schedule I thru V

**Importer** - Schedule I thru V

**Researcher** - Schedule I and only Schedule II manufactured  
or imported (see Items 1 and 6 on Instruction  
Sheet)

**MANUFACTURER** - Schedules I, II, III, IIII

In addition to codes furnished, bulk  
manufacturer (synthesizer/extractor)  
applicants MUST Circle  
'Basic Classes' of com-  
in Schedule I and II wh-  
to 'Manufacture in Bul-


IF ADDITIONAL SPACE IS REQUIRED, USE SEPARATE SHEET AND RETURN WITH  
APPLICATION.

**WARNING:** Section 843(A)(4), Title 21, United States Code, states that any person who  
knowingly or intentionally furnishes false or fraudulent information on this  
application is subject to imprisonment for not more than four years, a fine of  
not more than \$30,000.00 or both.

Drug Operations Manual  
Exhibit 55-2  
1/15/97

MCKMDL00652066

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MCKMDL00652067

MC-WV-00451.00195

Drug Operations Manual  
Exhibit 55-3  
1/15/97



McKesson Laboratories  
FAIRFIELD, CONN. U.S.A. 06430

INTER-ORGANIZATION CORRESPONDENCE

TO: Distribution Center Managers  
G. P. Frost - San Francisco  
✓ S. W. Knapp - San Francisco  
K. L. Larson - San Francisco  
E. E. Wilson - San Francisco  
ATTENTION: Regional Distribution Vice-Presidents  
CARBONS TO: "Area" Distribution Managers  
Rex Pharmaceuticals Branches

DATE: May 1, 1974  
FROM: L. W. Willson  
SUBJECT: Amobarbital, Secobarbital  
and Pentobarbital Parenter

This is to advise you that we have obtained approval from DEA to store the above products under Schedule III security. My letter requesting permission listed all Distribution Centers and Rex Pharmaceuticals Branches. I quote from the reply signed by Ronald W. Buzzeo, Chief - Regulatory Investigations Section.

"This is in response to your correspondence of March 11, 1974 regarding your request for approval to store amobarbital, secobarbital and pentobarbital parenterals requiring refrigeration in compliance with Schedule III security regulations.

The purpose of this letter is to grant permission to McKesson Laboratories to store the above named Schedule II barbiturates requiring refrigeration under Schedule III security regulations. This permission is granted to all locations listed in your letter of March 11, 1974."

TO: A. W. Knapp-San Francisco  
DATE: June 3, 1974  
FROM: L. W. Willson  
ATTENTION: E. E. Wilson-San Francisco  
SUBJECT: Use of Wording  
"McKesson Laboratories"  
CARBONS TO:

Dear Art:

I talked with Ken Durrin about the use of the wording "McKesson Laboratories" in the letter from Ron Buzzeo granting us permission to store Schedule II parenterals under Schedule III security. Ken said they had caught this error themselves, not to worry about it and that they would interpret "McKesson Laboratories" as "McKesson and Robbins".

Sincerely,

*L. W. Willson*

L. W. Willson

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MC-WV-00451.00196

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MCKMDL00652069

MC-WV-00451.00197



U.S. Department of Justice

Drug Operations Manual  
Exhibit 55-3a  
1/15/97

Drug Enforcement Administration

Washington, D.C. 20537

OCT 20 1989

Art Thysell  
Director, Distribution Planning  
McKesson Corporation  
One Post Street  
San Francisco, California 94104-5296

Dear Mr. Thysell:

Reference is made to your letter of September 15, 1989 requesting approval to store suppositories of oxymorphone and hydromorphone in compliance with Schedule III security regulations.

Permission is granted to store the above named Schedule II controlled substances under Schedule III security regulations. The permission is granted to all locations listed in your letter of September 15, 1989.

If you have any further questions regarding this matter please do not hesitate to contact this office.

Sincerely,

Gene R. Halslip  
Deputy Assistant Administrator  
Office of Diversion Control

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MCKMDL00652070

MC-WV-00451.00198

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MCKMDL00652071

MC-WV-00451.00199

## DRUG OPERATIONS MANUAL

Drug Operations Manual  
Exhibit 55-4  
1/15/97

## POWER OF ATTORNEY FOR DEA ORDER FORMS

\_\_\_\_\_  
(Name of Registrant)

\_\_\_\_\_  
(Address of Registrant)

\_\_\_\_\_  
(DEA Registration Number)

I, \_\_\_\_\_, the undersigned who is  
(Name of person granting power)  
authorized to sign the current application for registration of the above-named registrant under the Controlled Substances Act or Controlled Substances Import and Export Act, have made, constituted, and appointed, and by these presents, do make, constitute, and appoint \_\_\_\_\_, my true and  
(Name of attorney-in-fact)  
lawful attorney, for in my name, place, and stead, to execute application for books of official order forms and to sign such order forms in requisition for Schedule I and II controlled substances, in accordance with section 1308 of the Controlled Substances Act (21 U.S.C. 828) and Part 1305 of Title 21 of the Code of Federal Regulations. I hereby ratify and confirm all that said attorney shall lawfully do or cause to be done by virtue hereof.

\_\_\_\_\_  
(Signature of person granting power)

I, \_\_\_\_\_, hereby affirm that I am the person  
(Name of attorney-in-fact)  
named herein as attorney-in-fact and that the signature affixed hereto is my signature.

\_\_\_\_\_  
(Signature of attorney-in-fact)

Witnesses:

1. \_\_\_\_\_ 2. \_\_\_\_\_

Signed and dated on the \_\_\_\_ day of \_\_\_\_\_, 19\_\_ at \_\_\_\_\_

## NOTICE OF REVOCATION OF POWER OF ATTORNEY

The foregoing power of attorney is hereby revoked by the undersigned, who is authorized to sign the current application for registration of the above-named registrant under the Controlled Substances Act or the Controlled Substances Import and Export Act. Written notice of this revocation has been given to the attorney-in-fact this same day.

\_\_\_\_\_  
(Signature of person revoking power)

Witnesses:

1. \_\_\_\_\_ 2. \_\_\_\_\_

Signed and dated on the \_\_\_\_ day of \_\_\_\_\_, 19\_\_ at \_\_\_\_\_

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MCKMDL00652073

MC-WV-00451.00201

DR48L100 VER001  
REPORTING PERIOD TO 03/25/86

MCKESSON DRUG COMPANY  
CUSTOMERS WITH EXPIRED DEA NUMBERS  
FOR DC#

REPORT NO. DR48R10A PAGE: 1  
RUN DATE 02/21/86 TIME: 10:04

SALES TERRITORY: 006

	CUSTOMER	DEA NUMBER	EXPIRATION	PERMITTED SCHEDULES	R.A.M. SIGNATURE	DATE	CUSTOMER SIGNATURE	DATE
615278	AIRPORT PCHY MILE 41.5 GLENN HWY PALMER AK 99645 TEL: (907) 745-5419	AA7281722	06/30/85					
			__/_/__	2 2N 3 3N 4 5				
615070	INDEPENDENCE PARK 9500 INDEPENDENCE DR ANCHORAGE AK 99507 TEL: (907) 344-4924	A12501294	03/31/85					
			__/_/__	2 2N 3 3N 4 5				
620294	MEDICAL CTR-FAIRBKS 1867 AIRPORT ROAD FAIRBANKS AK 99701 TEL: (907) 4522328	AM706766	01/31/86					
			__/_/__	2 2N 3 3N 4 5				
620088	PAY N SAVE #125 1800 PARKS HWY WASSILA AK 99687 TEL: (907) 376-9668	NO DEA NUM	03/31/85					
			__/_/__					

Drug Operations Manual  
Exhibit 55-4a  
1/15/97

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MC-WV-00451.00202

MCKMDL00652074

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MCKMDL00652075

MC-WV-00451.00203



U.S. Department of Justice

Drug Operations Man  
Exhibit 55-5, Page 1 c  
1/15/97

Drug Enforcement Administration

Washington, D.C. 20537

Ronald J. Streck  
State Liaison Manager  
and Staff Attorney  
National Wholesale Druggists'  
Association  
1511 K Street, Northwest  
Washington, D.C. 20005

Dear Mr. Streck:

This is in reply to your correspondence of June 11, 1990 with accompanying distributor guidelines for the verification of DEA registration numbers and the identification and reporting of suspicious and/or excessive purchases.

The effort to provide effective controls and procedures to guard against the diversion of controlled substances has continually been one of the primary concerns and responsibilities of both the DEA and industry. The safeguards established by regulation and effectively implemented by industry are essential in accomplishing this goal. Title 21, Code of Federal Regulations, Section 1301.74, which requires a registrant to establish a system of customer verification and the reporting of suspicious orders and/or excessive purchases, is one such regulation. Understandably, the DEA has continued to maintain the position that the responsibility for devising and maintaining a system which accomplishes the above remains with the registrant. The DEA will only intervene when a system appears to be ineffective. At this point, the DEA can suggest to the registrant ways of improving the system.

The guidelines which you have provided appear to have definite merit from the standpoint of both practicality and effectiveness. Implementation of such a system would lend itself to increased capabilities on the part of a registrant to provide an effective customer verification and suspicious and/or excessive order monitoring system.

In closing I would like to state that these guidelines as presented appear to be appropriate for implementation and would serve as an effective instrument in accomplishing the requirements as set forth in Title 21, Code of Federal Regulations, Section 1301.74. However, it must be understood that these criteria can only be properly evaluated for effectiveness subsequent to implementation.

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MCKMDL00652076

MC-WV-00451.00204

Drug Operations Manual  
Exhibit 55-5, Page 2 of 2  
1/15/97

I appreciate the opportunity to be able to comment on this matter, and if I can be of any further assistance, please do not hesitate to contact me.

Sincerely,



Gene R. Haislip, Director  
Office of Compliance & Regulatory  
Affairs

PROGRAM 99L100 VER 003  
DATE 01/03/92 TIME 03.02.55  
DC 190 - SPOKANE

MCKESSON CORPORATION  
CONTROLLED SUBSTANCES SALES REPORT  
FOR MONTH OF DECEMBER 1991

8193 PAGE 2  
REPORT DR49R15A

VENDOR NUMBER	ITEM SEQ	ITEM DESCRIPTION	NDC NUMBER	NARCOTICS CODE
00107	5500	NEPERID VIAL 300MG 30ML ABB 10	00074603004	SCHEDULE II

QUANTITY	UNIT	CUSTOMER NUMBER	CUSTOMER NAME	INVOICE DATE	INVOICE NUMBER
3	CS	804641	KALISPELL REG	12/06/91	00914
4	CS	804039	ST PATRICK HOSPITAL	12/10/91	00001

7 TOTAL SALES FOR MONTH

VENDOR NUMBER	ITEM SEQ	ITEM DESCRIPTION	NDC NUMBER	NARCOTICS CODE
00107	5600	MORPHINE VIAL 30MG 30ML ABB 10	00074602304	SCHEDULE II

QUANTITY	UNIT	CUSTOMER NUMBER	CUSTOMER NAME	INVOICE DATE	INVOICE NUMBER
6	CS	804039	ST PATRICK HOSPITAL	12/06/91	00163
4	CS	804641	KALISPELL REG	12/06/91	00914
4	CS	804039	ST PATRICK HOSPITAL	12/10/91	00001
3	CS	804641	KALISPELL REG	12/19/91	00865

17 TOTAL SALES FOR MONTH

VENDOR NUMBER	ITEM SEQ	ITEM DESCRIPTION	NDC NUMBER	NARCOTICS CODE
00109	4705	PENTOTHAL SYR RTM 500MG 25	00074624301	SCHEDULE III-IV

QUANTITY	UNIT	CUSTOMER NUMBER	CUSTOMER NAME	INVOICE DATE	INVOICE NUMBER
1	EA	804641	KALISPELL REG	12/16/91	00547
1	EA	240754	ST. MARYS HOSPITAL	12/19/91	00092

2 TOTAL SALES FOR MONTH

VENDOR NUMBER	ITEM SEQ	ITEM DESCRIPTION	NDC NUMBER	NARCOTICS CODE
00109	4706	PENTOTHAL SYR RTM 500MG 25	00074642001	SCHEDULE III-IV

QUANTITY	UNIT	CUSTOMER NUMBER	CUSTOMER NAME	INVOICE DATE	INVOICE NUMBER
1	EA	439562	MISSOULA COMMUNITY HOSP	12/03/91	00145

Drug Operations Manual  
Exhibit 55-6  
1/15/97

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MCMDL00652078

MC-WV-00451.00206

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MCKMDL00652079

MC-WV-00451.00207

PROGRAM 49L200 VER 002  
 DATE 01/03/92 TIME 03:08:16  
 DC 190 - SPOKANE  
 R.A.H. #: 001

MCKESSON CORP. ATTN  
 CONTROLLED SUBSTANCES CUSTOMER PURCHASES

B190 PAGE 34  
 REPORT DR49R25A

DEC 1991 ACTIVITY AND ELEVEN MONTH PRIOR SUMMARY

HAMILTON DRUG CUST # 008433  
 110 SOUTH MAIN  
 COLFAX WA 99111 DEA # AH6248783

SKD	QTY	INV DATE	INV #	UNIT	ITEM #	NDC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION
3-4	1	12/24/91	00233	EA	1947951	00009002901	XANAX TAB 0.25MG	100 ALPRAZOLAM
		12/91	11/91	10/91	09/91	08/91	07/91	06/91 05/91 04/91 03/91 02/91 01/91
		1	1	0	2	1	0	0 1 0 0 0 0

SKD	QTY	INV DATE	INV #	UNIT	ITEM #	NDC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION
3-4	1	12/06/91	00114	EA	1947969	00009005501	XANAX TAB 0.5MG	100 ALPRAZOLAM
3-4	1	12/11/91	00330	EA	1947969	00009005501	XANAX TAB 0.5MG	100 ALPRAZOLAM
3-4	1	12/24/91	00233	EA	1947969	00009005501	XANAX TAB 0.5MG	100 ALPRAZOLAM
		12/91	11/91	10/91	09/91	08/91	07/91	06/91 05/91 04/91 03/91 02/91 01/91
		3	0	2	1	0	2	1 0 1 0 2 2

SKD	QTY	INV DATE	INV #	UNIT	ITEM #	NDC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION
3-4	1	12/20/91	00127	EA	2421519	00536462801	TEMAZEPAM CAP 15MG	100 RUG - TEMAZEPAM
		12/91	11/91	10/91	09/91	08/91	07/91	06/91 05/91 04/91 03/91 02/91 01/91
		1	0	2	1	1	0	2 0 2 0 0 0

SKD	QTY	INV DATE	INV #	UNIT	ITEM #	NDC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION
3-4	1	12/03/91	00275	EA	2762151	00677045701	CHLORDIAZ CAP 5MG	URL 1000 CHLORDIAZEPOXIDE HCL
3-4	1	12/16/91	00252	EA	2762151	00677045701	CHLORDIAZ CAP 5MG	URL 1000 CHLORDIAZEPOXIDE HCL
3-4	1	12/19/91	00345	EA	2762151	00677045701	CHLORDIAZ CAP 5MG	URL 1000 CHLORDIAZEPOXIDE HCL
3-4	1	12/24/91	00987	EA	2762151	00677045701	CHLORDIAZ CAP 5MG	URL 1000 CHLORDIAZEPOXIDE HCL
		12/91	11/91	10/91	09/91	08/91	07/91	06/91 05/91 04/91 03/91 02/91 01/91
		4	3	4	5	3	2	2 2 3 4 4 3

SKD	QTY	INV DATE	INV #	UNIT	ITEM #	NDC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION
5	1	12/09/91	00303	EA	1233287	00337481210	TUSSI-ORGANIDIN	1602 CODEINE/IODINATED GLYCE

Drug Operations Manual  
 Exhibit 55-6a  
 1/15/97

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MC-WV-00451.00208

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MCKMDL00652081

MC-WV-00451.00209

MC-WV-00451.00210

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06...L300 VER 001  
REPORTING PERIOD 08/01/85 THRU 08/31/85

132 SACRAMENTO  
DEA NO. PH0021535

MCKESSON DRUG COMPANY  
CUSTOMER RECAP VARIANCE REPORT  
ARCOS ITEMS BY HOSPITAL

REPORT NO. 0946R35A PAGE 1  
PLAI DATE 09/04/85 TIME 11:50:32

CUSTOMER NUMBER	CUSTOMER NAME	CUSTOMER ADDRESS	CUSTOMER CITY & STATE	ZIP CODE	DEA NUMBER	TOTAL QTY PURCHASED
BASE CODE - 9062	CODEINE SULFATE	FACTOR - 03.00				
430017	KAISER PHCV DIV 3-	1710 2ND STREET	BERKELEY	CA 94710	PK0064422	155.33326 *
					BASE CODE MONTHLY AVERAGE	51.77776
BASE CODE - 9130	DIHYDROCODEINE HYDROBROMIDE BIPHENYLATE	FACTOR - 03.00				
525352	KFH OUTPATIENT PHARMACY	2025 MORSE AVE	SACRAMENTO	CA 95825	AK1350337	7.17370 *
					BASE CODE MONTHLY AVERAGE	2.39125
BASE CODE - 9740	SUFENTANIL CITRATE	FACTOR - 03.00				
427724	KFRP 1130 INPATIENT	2425 GEARY STREET	SAN FRANCISCO	CA 95115	AK2125074	0.04521 *
					BASE CODE MONTHLY AVERAGE	0.05602
						0.01597

Drug Operations Manual  
Exhibit 55-7, Page 1 of 4  
1/15/97

MCKMDL00652082

MC-WV-00451.00211

CONFIDENTIAL

1 300 VER 001  
 1 1115 PERIOD 08/01/05 THRU 08/31/05  
 IL -CRANFORD  
 DEA NO. PH0021535

MCKESSON DRUG COMPANY  
 CUSTOMER RECAP VARIANCE REPORT  
 NON-ARCOS ITEMS BY HOSPITAL

REPORT NO. DR46835A PAGE 1  
 RUN DATE 09/04/05 TIME 11:50 32

CUSTOMER NUMBER	CUSTOMER NAME	CUSTOMER ADDRESS	CUSTOMER CITY & STATE	ZIP CODE	DEA NUMBER	TOTAL QTS PURCHASED
BASE CODE - 9273	DEXTROPROPOTYPHEME HYDROCHLORI	FACTOR - 00.00				
430017	KAISER PHCY DIV 3	1710 2ND STREET	BERKELEY	CA 94710	PH00064422	1020.77576 *
					BASE CODE MONTHLY AVERAGE	120.36697
BASE CODE - 9704	PENTAZOCINE LACTATE	FACTOR - 00.00				
430017	KAISER PHCY DIV 3	1710 2ND STREET	BERKELEY	CA 94710	PH00064422	560.35016 *
					BASE CODE MONTHLY AVERAGE	959.04000
						71.04377

MCKMDL00652083

MC-WV-00451.00212

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DR47L100 VER 001  
REPORTING PERIOD 08/01/85 THRU 08/31/85

NCKESSON DRUG COMPANY  
DETAILED CUSTOMER VARIANCE REPORT  
ARCOS ITEMS BY HOSPITAL

REPORT NO. 0047005A PAGE 1  
RUN DATE 09/11/85 TIME 10.40.43

182 SACRAMENTO  
DEA NO. PM0021535

INVOICE DATE	INVOICE NUMBER	ITEM NUMBER	HDC NUMBER	ITEM DESCRIPTION	QUANTITY PURCHASED	GRAM WEIGHT	GRAMS PURCHASED
430017 KAISER PHCY DIV 3 1710 2ND STREET BERKELEY , CA 94710 PK0064422							
BASE CODE - 9062 CODEINE SULFATE				FACTOR - 3.00	INGREDIENT LIMIT 155.33328 *		
08/12/85	2009224	1241031	00001-0225-55	EMPIRIN W/COD 60MG 84	100	144 4.42020	636.50880
						CUSTOMER TOTAL	636.50880
						BASE CODE MONTHLY AVERAGE	51.77776

MCKMDL00652084

MC-WV-00451.00213

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DR47L100 VER 001  
REPORTING PERIOD 08/01/85 THRU 08/31/85

MCKESSON DRUG COMPANY  
DETAILED CUSTOMER VARIANCE REPORT  
NON-ARCOS ITEMS BY HOSPITAL

REPORT NO. DR47R05A PAGE 1  
RUN DATE 09/11/85 TIME 10.40.43

182 SACRAMENTO  
DEA NO. PM0021535

INVOICE DATE	INVOICE NUMBER	ITEM NUMBER	DOC NUMBER	ITEM DESCRIPTION	QUANTITY PURCHASED	GRAM X WEIGHT	GRAMS = PURCHASED
410017 KAISER PKCY DIV 3 1710 2ND STREET BERKELEY, CA 94710 PK0064422							
BASE CODE - 9273 DEXTROPROPOXYPHENE HYDROCHLORIDE FACTOR - 8.00					INGREDIENT LIMIT 1026.77576 =		
08/19/85	2004231	1435221	00002-0343-02	DARVOCEY-M 100 TAB	1893	528 6.19800	3272.54400
08/19/85	2004231	1881838	00002-0351-02	DARVOCEY-M 50 TAB	1890	60 3.09900	185.94000
					CUSTOMER TOTAL 3458.48400		
					BASE CODE MONTHLY AVERAGE 128.34697		
BASE CODE - 9709 PENTAZOCINE LACTATE FACTOR - 8.00					INGREDIENT LIMIT 568.35016 =		
08/05/85	2038217	1251362	00024-1951-04	TALWIN HX TAB 50MG	7540	100 216 4.44000	959.04000
					CUSTOMER TOTAL 959.04000		
					BASE CODE MONTHLY AVERAGE 71.04377		

MCKMDL00652085

Drug Operations Manual  
Exhibit 55-8  
1/15/97

Special Agent in Charge  
Drug Enforcement Administration  
Division  
(Address - See Exhibit 55-9)

CERTIFIED MAIL

Dear Mr. \_\_\_\_\_:

Enclosed, pursuant to CFR21, § 1301.74(b) are the Customer Recap Variance Report and the Monthly Controlled Substance Suspicious Purchases Report for the month of \_\_\_\_\_, 19\_\_.

The Customer Recap Variance Report reflects exceptions as noted to the guidelines approved by DEA for detecting orders of unusual size, orders deviating substantially from normal pattern, and orders of unusual frequency for controlled substance items with base codes assigned to them. The Monthly Controlled Substance Suspicious Purchases Report reflects purchases of all controlled substances, Schedules II, IIN, III, IIIN, IV, V according to the same guidelines as the Customer Recap Variance Report. A listing of the parameters used are available upon request.

With the submission of these reports for the month of \_\_\_\_\_, we are leaving to DEA the final determination of whether they are suspicious or unusual.

Very truly yours,

\_\_\_\_\_  
Distribution Center Manager

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MCKMDL00652087

MC-WV-00451.00215

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## MCKMDL00652088

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Reproduc  
Form  
Locally

Drug Operations Manual  
Exhibit 55-9  
1/15/97

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MCKMDL00652089

MC-WV-00451.00217

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<b>See Reverse of PURCHASER'S Copy for Instructions</b>			No order form may be issued for Schedule I and II substances unless a completed application form has been received, (21 CFR 1305.04).			<b>OMB APPROVAL No. 1117-0010</b>			
TO: (Name of Supplier) <b>Roxane Labs</b>				STREET ADDRESS <b>1809 Wilson Road</b>					
CITY and STATE <b>Columbus, OH</b>				DATE <b>12/21/90</b>		<b>TO BE FILLED IN BY SUPPLIER</b>			
				SUPPLIERS DEA REGISTRATION No.					
<b>TO BE FILLED IN BY PURCHASER</b>									
LINE No.	No. of Packages	Size of Package	Name of Item	National Drug Code				Packages Shipped	Date Shipped
1	5	4x25	Levorphanol Tab 2mg RN						
2	1	100	Meperidine Tab 100mg ROX						
3	3	100	Methadone Tab 10mg						
4	1	4x25	Methadone Tab 5mg RN						
5	3	100	Morphine Tab 15mg						
6	3	100	Roxicet Capl 5/500mg						
7	1	100	Roxicet Tab 5/325mg						
8	12	100	Roxanol SR Tab 30mg						
9	1	25	Marinol Cap 5.0mg						
10									
9			<b>NO. OF ITEMS ORDERED (MUST BE 10 OR LESS)</b>		<b>SIGNATURE OF PURCHASER OR ATTORNEY OR AGENT</b>				
Date Issued <b>07-27-95</b>			DEA Registration No. <b>PH0021535</b>		<b>MCKESSON DRUG COMPANY</b> <b>3775 SEAPORT BLVD</b> <b>WEST SACRAMENTO, CA 95691</b>				
Schedules <b>2,3,3N,4,5</b>									
Registered as a <b>DISTRIBUTOR</b>			No. of this Order Form <b>952046760</b>						
DEA Form -222 (Oct. 1992)			<b>U.S. OFFICIAL ORDER FORMS - SCHEDULES I &amp; II</b>				<b>55633064</b>		
			DRUG ENFORCEMENT ADMINISTRATION						
			SUPPLIER'S Copy 1						

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MC-WV-00451.00219

Drug Operations Manual  
Exhibit 55-11, Page 1 of 2  
1/15/97

U.S. DEPARTMENT OF JUSTICE / DRUG ENFORCEMENT ADMINISTRATION <b>REPORT OF THEFT OR LOSS OF CONTROLLED SUBSTANCES</b>			OMB APPROVAL No. 1117-0001
Federal Regulations require registrants to submit a detailed report of any theft or loss of Controlled Substances to the Drug Enforcement Administration. Complete the front and back of this form in triplicate. Forward the original and duplicate copies to the nearest DEA Office. Retain the duplicate copy for your records. Some states may also require a copy of this report.			DEA MANUAL AUTHORITY: Division Investigators 8124 FIS: 630-02
1. NAME AND ADDRESS OF REGISTRANT (Include ZIP Code)			2. PHONE NO. (Include Area Code)
ZIP CODE [ ][ ][ ][ ][ ][ ][ ]			
3. DEA REGISTRATION NUMBER  2 ltr. prefix [ ][ ]      7 digit suffix [ ][ ][ ][ ][ ][ ][ ]	4. DATE OF THEFT OR LOSS	5. PRINCIPAL BUSINESS OF REGISTRANT (Check one) <div style="display: flex; justify-content: space-between;"> <div> 1 <input type="checkbox"/> Pharmacy  2 <input type="checkbox"/> Practitioner  3 <input type="checkbox"/> Manufacturer  4 <input type="checkbox"/> Hospital/Clinic </div> <div> 5 <input type="checkbox"/> Distributor  6 <input type="checkbox"/> Methadone Program  7 <input type="checkbox"/> Other (specify) _____ </div> </div>	
6. COUNTY IN WHICH REGISTRANT IS LOCATED	7. WAS THEFT REPORTED TO POLICE?  <input type="checkbox"/> YES <input type="checkbox"/> NO	8. NAME AND TELEPHONE NUMBER OF POLICE DEPARTMENT (Include Area Code)	
9. NUMBER OF THEFTS OR LOSSES REGISTRANT HAS EXPERIENCED IN THE PAST 24 MONTHS ?	10. TYPE OF THEFT OR LOSS (Check one and complete items below as appropriate) <div style="display: flex; justify-content: space-between;"> <div> 1 <input type="checkbox"/> Night break-in  2 <input type="checkbox"/> Armed robbery </div> <div> 3 <input type="checkbox"/> Employee pilferage  4 <input type="checkbox"/> Customer theft </div> <div> 5 <input type="checkbox"/> Other (Explain) _____  6 <input type="checkbox"/> Lost in transit (Complete item 14) </div> </div>		
11. IF ARMED ROBBERY, WAS ANYONE:  KILLED ? <input type="checkbox"/> No <input type="checkbox"/> Yes (How many) _____ INJURED ? <input type="checkbox"/> No <input type="checkbox"/> Yes (How many) _____		12. PURCHASE VALUE TO REGISTRANT OF CONTROLLED SUBSTANCES TAKEN ?  \$ _____	13. WERE ANY PHARMACEUTICALS OR MERCHANDISE TAKEN ?  <input type="checkbox"/> No <input type="checkbox"/> Yes (Est. Value) \$ _____
14. IF LOST IN TRANSIT, COMPLETE THE FOLLOWING:			
A. Name of Common Carrier	B. Name of Consignee	C. Consignor's DEA Registration Number	
D. Was the carton received by the customer ?  <input type="checkbox"/> Yes <input type="checkbox"/> No	E. If received, did it appear to be tampered with ?  <input type="checkbox"/> Yes <input type="checkbox"/> No	F. Have you experienced losses in transit from this same carrier in the past ?  <input type="checkbox"/> No <input type="checkbox"/> Yes (How Many) _____	
15. WHAT IDENTIFYING MARKS, SYMBOLS, OR PRICE CODES WERE ON THE LABELS OF THESE CONTAINERS THAT WOULD ASSIST IN IDENTIFYING THE PRODUCTS ?			
16. IF OFFICIAL CONTROLLED SUBSTANCE ORDER FORMS (DEA-222) WERE STOLEN, GIVE NUMBERS			
17. WHAT SECURITY MEASURES HAVE BEEN TAKEN TO PREVENT FUTURE THEFTS OR LOSSES ?			

#### PRIVACY ACT INFORMATION

**AUTHORITY:** Section 301 of the Controlled Substances Act of 1970 (PL 91-613).

**PURPOSE:** Report theft or loss of Controlled Substances.

**ROUTINE USES:** The Controlled Substances Act authorizes the production of special reports required for statistical and analytical purposes. Disclosure of information from this system are made to the following categories of users for the purposes stated:

A. Other Federal law enforcement and regulatory agencies for law enforcement and regulatory purposes.

B. State and local law enforcement and regulatory agencies for law enforcement and regulatory purposes.

**EFFECT:** Failure to report theft or loss of controlled substances may result in penalties under Section 402 and 403 of the Controlled Substances Act.

DEA Form - 106  
(Dec. 1985)

Previous edition dated 3/82 is OBSOLETE.

CONTINUE ON REVERSE

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MC-WV-00451.00220

## LIST OF CONTROLLED SUBSTANCES LOST

Trade Name of Substance or Preparation	Name of Controlled Substance in Preparation	Dosage Strength and Form	Quantity
Examples: Desoxyn	Methamphetamine Hydrochloride	5 Mg Tablets	3 x 100
Demerol	Meperidine Hydrochloride	60 Mg/ml Vial	6 x 30 ml
Robitussin A-C	Codaine Phosphate	2 Mg/cc Liquid	12 Pints
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50.			

I certify that the foregoing information is correct to the best of my knowledge and belief.

Signature

Title

Date

© U.S. Government Printing Office: 1985-491-509/55008

DEA ORDER FORM GUIDELINES

These summary guidelines are intended to provide a ready reference for the wholesaler's use in determining when to fill and when not to fill Federal Order Forms. Set forth thereafter is the full text of Unaccepted and Defective Order Forms (21 CFR 1305.11). See suggested form for the return of Order Forms page 55-82.

ORDER FORMS MUST BE REJECTED AND RETURNED TO THE CUSTOMER FOR THE FOLLOWING REASONS:

1. Illegibility or inability to identify the customer, customer's registration number, items specified, quantities or improper execution or endorsement.
2. Any alterations, erasures or changes resulting in questions regarding identity of the customer, the customer's registration number, the number of items or quantities.
3. Shows a cancelled or voided line by the purchaser.
4. Omitted signature.
5. Sixty (60) days have elapsed from the date of execution by the purchaser.
6. The box showing total number of lines completed is blank, contains a roman numeral, or is different than the number of items actually ordered.
7. Registrant's address incorrectly states a P.O. Box.
8. Form does not show authorization to receive both II and IIN schedules.

ORDER FORM CORRECTIONS WHICH CAN BE MADE

(Only on Order Forms which identify the customer, customer's registration number, items and quantities and are properly signed.)

1. Filling in the wholesaler's correct name, address, city or state when one or more of these have been omitted by the customer. To assure the problem is not repeated, the supplier must provide the purchaser with the correct address in writing.
2. Filling in the date when this has been omitted. Where possible, the postal date on the envelope should be used.
3. Adding or changing hydrochloride, sulfate, phosphate, ampules, tablets, etc., if the customer's order is otherwise correct in all respects. For example, if it specifies (in error) capsules and the product requested is properly designated and supplied in tablets, then the order can be modified to correct "capsules" to "tablets".

SINGLE LINE ITEMS MUST BE CANCELLED FOR THE FOLLOWING REASONS, BUT THE BALANCE OF THE ORDER MAY BE FILLED:

(Only on Order Forms which identify the customer, customer's registration number, items and quantities and are properly signed.)

1. If the item ordered is discontinued, not listed, or not a Schedule II Controlled Substance.
2. Strength is dittoed.

3. Strength is omitted (except trademark items when the National Drug Code number is listed).
4. Size of package is incorrectly stated (quantity may be reduced).
5. Size of package is omitted.
6. The box showing "No. of Packages" is a roman numeral.

**ORDER FORM DEA 222**

Size of stock package (100's, 250's, 500's etc.)

Wholesaler's name, city & state (may be filled in by wholesaler where any or all are omitted or entered incorrectly)

Date may be inserted if omitted (insert post mark date if known (no more than 60 days old)

(may be corrected if product comes in only one form and wrong form is stated)

(may be corrected if quantity not increased)

Product name, dosage form & strength

Customer error on NDC letters or digits can be corrected if product is described correct

Exact number of stock packages

Enter total # of ITEMS ORDERED.

Lack of signature voids Form

Shipment must be made to address on Form. P.O. Box is not a valid address and order cannot be filled.

**Schedule Permitted to Purchase**

Schedule	Permitted to Purchase
2	- Schedule II, narcotics
2N	- Schedule II, nonnarcotics
3	- Schedule III, narcotics
3N	- Schedule III, nonnarcotics
4	- All Schedule IV's
5	- All Schedule V's

2. If the customer so requests; call D.E.A. and request approval to fill pending correction of renewal error.

**\* NOTE:** If a customer's form does not show registration for both schedule I & IIN, the order is not to be filled. The DCM or designate should

1. Call the customer to advise of the problem and recommend the contact D.E.A. to submit a new registration renewal.

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MC-WV-00451.00225



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MCKMDL00652099

MC-WV-00451.00227

## ARCOS TRANSMITTAL SHEET

DC Name: \_\_\_\_\_ Date: \_\_\_\_\_

Type of Transaction	Trans. Code	No. of Entries	Total Pieces	Edit Verification
A. Sales to Customers Returns to Vendors	S	_____	_____	_____
B. Receipts Vendor (Rec. Records) Customers (Credit Memos)	P	_____	_____	_____
C. Shipments Refused by Customers	R	_____	_____	_____
D. Merchandise Lost in Transit	X	_____	_____	_____
E. Theft on Premises	T	_____	_____	_____
F. Destroyed by DEA	Y	_____	_____	_____
G. Government Seizure	Z	_____	_____	_____
H. Unsolicited Returns (NOTIFY VPDO BEFORE THIS TRANSACTION CODE IS USED.)	V	_____	_____	_____
Grand Total		_____	_____	_____
Date Edit Completed		_____		

1. Fill in number of transactions to be key-entered for each code.
2. Fill in the total number of pieces to be key-entered for all transactions.

(01/97)

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MC-WV-00451.00229

MC-WV-00451.00230

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DATE=06/19/82 TIME=0739 MASTER FILE INDEX FOR.P.Q001005A PAGE 1

MODULE	PSID	MODULE DESCRIPTION	ADDED	UPDATED	RECORDS	LANG	PROC	PROGRAMMER
JUL101TS	TOKK	DIV. 101 URBAN TRANS -	JUL 06/13/82	NOT UPDATED	3134	TS	\$HOJCL	H4
JUL102TS	DXLX	DIV. 102 TRANS TO SUBMIT -	JUL 06/06/82	NOT UPDATED	1721	TS	\$HOJCL	H4
JUL103TS	HTDC	DIV. 103 TRANS TO SUBMIT -	JUL 06/02/82	NOT UPDATED	810	TS	\$HOJCL	H3
JUL105TS	KFGK	DIV. 105 TRANS TO SUBMIT -	JUL 06/10/82	NOT UPDATED	1106	TS	\$HOJCL	H6
JUL100TS	XHLJ	DIV. 100 TRANS TO SUBMIT -	JUL 06/05/82	NOT UPDATED	840	TS	\$HOJCL	H3
JUL110TS	BXVX	DIV. 110 TRANS TO SUBMIT -	JUL 06/05/82	NOT UPDATED	1700	TS	\$HOJCL	H4
JUL113TS	HDBR	DIV. 113 TRANS TO SUBMIT -	JUL 06/10/82	NOT UPDATED	1351	TS	\$HOJCL	H4
JUL118TS	LZHC	DIV. 118 TRANS TO SUBMIT -	JUL 06/12/82	NOT UPDATED	2664	TS	\$HOJCL	H2
JUL121TS	FXJT	DIV. 121 TRANS TO SUBMIT -	JUL 06/10/82	NOT UPDATED	1030	TS	\$HOJCL	H6
JUL122TS	GXTT	DIV. 122 TRANS TO SUBMIT -	JUL 06/04/82	NOT UPDATED	2372	TS	\$HOJCL	H4
JUL124TS	DLVP	DIV. 124 TRANS TO SUBMIT -	JUL 06/04/82	NOT UPDATED	672	TS	\$HOJCL	H5
JUL125TS	XHLG	DIV. 125 TRANS TO SUBMIT -	JUL 06/05/82	NOT UPDATED	1193	TS	\$HOJCL	H6
JUL126TS	GJGR	DIV. 126 TRANS TO SUBMIT -	JUL 06/05/82	NOT UPDATED	3103	TS	\$HOJCL	H3
JUL129TS	DKKH	DIV. 129 URBAN TRANS -	JUL 06/16/82	NOT UPDATED	2966	TS	\$HOJCL	H3
JUL131TS	XTIRI	DIV. 131 TRANS TO SUBMIT -	JUL 06/10/82	NOT UPDATED	2929	TS	\$HOJCL	H3
JUL132TS	TVVH	DIV. 132 TRANS TO SUBMIT -	JUL 07/31/82	NOT UPDATED	2015	TS	\$HOJCL	H4
JUL133TS	XOCO	DIV. 133 TRANS TO SUBMIT -	JUL 06/10/82	NOT UPDATED	681	TS	\$HOJCL	H3
JUL134TS	CSPT	DIV. 134 TRANS TO SUBMIT -	JUL 06/10/82	NOT UPDATED	1214	TS	\$HOJCL	H3
JUL135TS	HRTF	DIV. 135 TRANS TO SUBMIT -	JUL 06/02/82	NOT UPDATED	1044	TS	\$HOJCL	H3
JUL136TS	VIMR	DIV. 136 TRANS TO SUBMIT -	JUL 06/12/82	NOT UPDATED	824	TS	\$HOJCL	H3
JUL138TS	CHHH	DIV. 138 TRANS TO SUBMIT -	JUL 06/04/82	NOT UPDATED	1004	TS	\$HOJCL	H3
JUL139TS	DPCV	DIV. 139 TRANS TO SUBMIT -	JUL 06/04/82	NOT UPDATED	1729	TS	\$HOJCL	H3
JUL140TS	JPHG	DIV. 140 URBAN TRANS -	JUL 06/12/82	NOT UPDATED	609	TS	\$HOJCL	H4
JUL141TS	XXKK	DIV. 141 TRANS TO SUBMIT -	JUL 06/11/82	NOT UPDATED	1822	TS	\$HOJCL	H3

55 - CONTROLLED SUBSTANCES

Drug Operations Manual  
Exhibit 55-16  
1/15/97

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MC-WV-00451.00231

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## ARCOS BATCH CONTROL AND TRANSACTION EDIT ERRORS

HUNTSVILLE, ALABAMA  
519 COLUMBIA AVE  
SCOTT, BROS.

[illegible]

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MCKMDL00652107

MC-WV-00451.00235

PROGRAM DI731030 1.2

## ARCOS TRANSACTION SUBMISSION CONTROL FORM

SUBMITTED BY: FOREMOST-MCKESSON, INC.  
 3500 SPRINKLE ROAD  
 KALAHAZOO, MI. 49002

REGISTRATION NUMBER	PERIOD COVERED		TRANSACTION IDENTIFIERS		BATCH NUMBER
	FROM	TO	FIRST	LAST	
PH0030972	07/01/82	07/31/82	8207000001	8207002663	82231001H2
PH0032588	07/01/82	07/31/82	8207000001	8207001679	82231002H2
PH0038592	07/01/82	07/31/82	8207000001	8207001763	82231003H2
PH0036334	07/01/82	07/31/82	8207000001	8207001425	82231004H2
PH0036550	07/01/82	07/31/82	8207000001	8207002044	82231005H2
PH0037615	07/01/82	07/31/82	8207000001	8207001390	82231006H2
PH0037374	07/01/82	07/31/82	8207000001	8207002043	82231007H2

TRANSACTIONS ARE SUBMITTED ON TAPE  
 TAPE FORMAT IS UNLABELED 1600 BPI

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MC-WV-00451.00237

## NOTICE OF UNACCEPTABLE ORDER FORM

Drug Operations M  
Exhibit 55-20  
1/15/97

Customer Name: \_\_\_\_\_ Date: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_

The Drug Enforcement Administration has established specific criteria for the acceptance of Federal Order Forms, DEA Form 222. In some cases we are required to return the form to you and request a new or corrected form before shipping. In other cases we can make minor changes and process the form for shipment.

Your Federal Order Form \_\_\_\_\_ was not complete and/or correct in all respects. We have handled this as follows:

The omission and/or error indicated below is such that we are not permitted to process this form:

- ☐ Form is altered.
- ☐ 60 days have elapsed from date of execution.
- ☐ Number in No. of Items Ordered/Last Line Completed box is blank, contains Roman numerals, or is different than number of items ordered/last line completed.
- ☐ Signature omitted.
- ☐ Form does not show authorization to receive both II and IIN schedules.
- ☐ Registrant's address incorrectly states a P.O. Box.
- ☐ Form shows a canceled or voided line by the purchaser.

If your form is being returned:

- ☐ Reference our phone conversation.
- ☐ Please submit a new form.
- ☐ Please review attached form and return.
- ☐ See example attached.

Changes indicated below have been made, as permitted by the DEA, and your order has been shipped. This notice is for information purposes only. No action on your part is required:

- ☐ Our name and/or address has been completed or corrected. Our correct address is (your DC address).
- ☐ You sent all three copies to us. We are returning Copy 3 for your files.
- ☐ We corrected the NDC # on line item # \_\_\_\_\_.
- ☐ We modified the dosage form on line item # \_\_\_\_\_.
- ☐ You requested \_\_\_\_\_, but the product is only supplied as \_\_\_\_\_.
- ☐ Substitution of different size package has been made on line item # \_\_\_\_\_.
- ☐ Line item # \_\_\_\_\_. Total product supplied is equal to or less than original request.
- ☐ Line item # \_\_\_\_\_. No. of packages or size is omitted. We canceled this line and processed remainder of order.
- ☐ Line item # \_\_\_\_\_. A Roman numeral was used for order quantity. We canceled this line and processed remainder of order.
- ☐ Line item # \_\_\_\_\_ is not a Schedule II Controlled Substance. We canceled this line and processed remainder of order.
- ☐ Line item # \_\_\_\_\_ is discontinued. It is still available in \_\_\_\_\_ NDC # \_\_\_\_\_. We canceled this line and processed remainder of order.
- ☐ Line item # \_\_\_\_\_. Package size/product description is incomplete or incorrect. We canceled this line and processed remainder of order.
- ☐ Line item # \_\_\_\_\_. We are currently out of inventory on this item. Per your verbal/written instructions, we have substituted this item with the comparable name brand/generic (circle one) \_\_\_\_\_ (insert item name)

Thank you for your cooperation.

**McKESSON DRUG COMPANY**

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MCKMDL00652111

MC-WV-00451.00239



U.S. Department of Justice

Drug Enforcement Administration

Washington, D.C. 20537

OCT 23 1995

McKesson Drug Data Center  
ATTN: Dan White  
11000 Trade Center Drive  
Rancho Cordova, CA 95670

Dear Registrant:

Your Central Reporting Identifier is 030. Refer to this number when requesting an update of your reporting file. The request must include the address of the central reporting location and advise if you want all mail returned to the central location or if you want correspondence delivered to each reporting location.

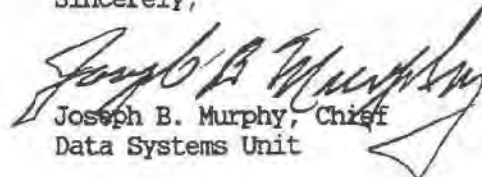
Forward a copy of this letter to each of your reporting locations as proof of authorization to report centrally.

If further information is needed concerning this system, please contact the Data Systems Unit (ARCOS) at the address listed below:

Drug Enforcement Administration  
Data Systems Unit (ARCOS)  
P. O. Box 28293  
Central Station  
Washington, D.C. 20005

Telephone No. (202) 307-8600

Sincerely,

  
Joseph B. Murphy, Chief  
Data Systems Unit

Enclosure

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MCKMDL00652112

MC-WV-00451.00240

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MCKMDL00652113

MC-WV-00451.00241

OMB Approval No. 1117-0007	DEPARTMENT OF JUSTICE / DRUG ENFORCEMENT ADMINISTRATION REGISTRANTS INVENTORY OF DRUGS SURRENDERED	PACKAGE No.
-------------------------------	---	-------------

The following schedule is an inventory of controlled substances which is hereby surrendered to you for proper disposition.

FROM: (Include Name, Street, City, State and ZIP Code in space provided below).

<div style="position: relative; width: 100%; height: 100%;"> <div style="position: absolute; top: 0; left: 0; width: 100%; height: 100%; border: 1px solid black;"></div> </div>
--

Signature of applicant or authorized agent
Registrant's DEA Number
Registrant's Telephone Number

NOTE: Registrants will fill in Columns 1, 2, 3, and 4 Only.

DATE OF RETURN \_\_\_\_\_

NAME OF DRUG OR PREPARATION	Number of Containers	CONTENTS (Number of grams, tablets, ounces or other units per container)	Controlled Substance Content (Each Unit)	FOR DEA USE ONLY			
				DISPOSITION	QUANTITY		
					GMS.	MGS.	
1	2	3	4	5	6	7	
2							
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16							

DEA Form

\* See instructions on reverse side

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MCKMDL00652114

MC-WV-00451.00242

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MCKMDL00652115

MC-WV-00451.00243

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MC-WV-00451.00244

ARCOS CORRECTION FORM																
CHECK ONE	SEQUENCE NUMBER															
	DELETE														EDIT PAGE #	
	REPLACE														CORRECTION #	
	INSERT															
McKESSON DEA NUMBER		TRANS. TYPE*	NDC NUMBER				QUANTITY	CUSTOMER'S DEA NUMBER				ORDER FORM # (SCHEDULE II)		DATE	AUDIT	
*TRANS. TYPE CODES		REASON FOR THE ERROR														
3=ENDING INVENTORY																
P=PURCHASE																
P=CREDIT																
R=REFUSED ORDER																
S=SALE																
Y=DESTRUCTION																
		DCM SIGNATURE														

Drug Operations Mail  
Exhibit 55-23  
1/15/97

MCKMDL00652116

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MCKMDL00652117

MC-WV-00451.00245

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

## QUARTERLY DEA CHECKLIST

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
1	Federal Regulatory Requirements	55-7	Are DEA publications on hand: a. Code of Federal Regulations? b. ARCOS General Reporting Manual?	1		
2	Federal Regulatory Requirements	55-8	Are government inspection forms and files on hand (Exhibit 55-39)?	1		
3	Registration & Re-registration	55-12	Is the DC's DEA Certificate posted in the DC's vault/cage?	1		
4	Security	55-20	Is the vault day gate self-closing and self-locking? Are the top and bottom of day gate enclosed to prevent "fishing"?	1		
5	Security	55-21	Are DEA cage bolts are pinned or brazed?	1		
6	Security	55-22	Are cage doors self-closing and self-locking?	1		
7	Security	55-22	Are schedule III - V controlled substances stored with Schedule II? If so, is there a letter of authorization from DEA on file?	1		
8	Security	55-22	Are non-controlled substances stored in cage or vault? If yes, is there a letter of authorization from the DEA on file?	1		
9	Security	55-23	Are warehouse entrance doors self-closing and self-locking? Are "No Cameras" signs posted on warehouse entrance doors?	1		
10	Security	55-23	Are employee DEA background checks performed on all employees authorized to enter the cage or vault?	1		
11	Security	55-24	Is a Visitors log/"Consent to Search" log being used? (Exhibit 55-35) Are visitor badges on hand?	1		
12	Security	55-24	Is a list of personnel authorized to enter the warehouse posted at entrance and computer room?	1		
13	Security	55-24	Is a list of personnel authorized to enter cage and vault posted at both the cage and the vault?	1		
14	Security	55-25	Are door checks and locker inspections conducted at least once a month and documented?	1		
15	Security	55-27	Is a DEA walk test conducted at least once a month and a log of such tests (Exhibit 55-36) maintained?	1		
16	Security	55-28	Is an alarm log (Exhibit 55-37) maintained and secured by the DCM or designee?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
17	Security	55-28	Are controlled substances NOT left in the receiving area overnight? Are controlled substances NOT left outside the cage or vault? Are procedures followed in the receiving area during daytime business hours?	1		
18	Security	55-29	Are the cage and vault keys controlled (locked-up) during non-working hours, including breaks and lunch periods?	1		
19	Security	55-29	Are controlled substance orders NOT stored in the cabs of delivery trucks? Are controlled substance orders NOT left in delivery trucks overnight?	1		
20	Security	55-30	Are controlled substance orders signed off by line on the delivery manifest by drivers?	1		
21	Verification of Customer Registration	55-31	Is the DC's DR48 up to date, and its file retention (3 years) current?	1		
22	Verification of Customer Registration	55-32	Are DT51 customers with incomplete RXDA schedules posted in cage and vault monthly?	1		
23	Verification of Customer Registration	55-36	Are DEA "Continuing Education" reports (Exhibit 55-33) filed in the internal DC DEA file?	1		
24	Order Form Regulations	55-3	Are controlled substances shipped to customer addresses as noted on the DEA-required registration certificates?	1		
25	Suspicious Orders	55-39	Is Controlled Substance Sales Report DR49R15A on hand in monthly records?	1		
26	Suspicious Orders	55-39	Is Controlled Substance Sales Report DR49R15A (Exhibit 55-6) on hand in monthly records?	1		
27	Suspicious Orders	55-41	Are controlled substance "Suspicious Order Warning" reports (DU45) on hand with the DC's monthly ARCOS records?	1		
28	Suspicious Orders	55-40	Is "Customer Recap Variance Report" DR46 on hand in monthly records?	1		
29	Suspicious Orders	55-41	Is a copy of the Exhibit 55-8 cover letter kept with monthly controlled substance files?	1		
30	Suspicious Orders	55-43	Is the Unusual Purchases Notification Log (Exhibit 55-9) on hand with the DC's internal DEA file?	1		
31	Suspicious Orders	55-43	Are order forms reviewed and initialed by DC executive prior to filing?	1		
32	Suspicious Orders	55-43	Is the DC's unusual purchase notification log mailed to its DEA regional office monthly, "Certified Mail/Return Receipt Requested"?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
33	Order Form Regulations	55-44	Are any facsimile DEA 222 copies on hand?	1		
34	Inventories	55-48	Inventory count sheet DU10: a. First, second, consolidated counts?	1		
		55-49	b. Dated, signed and open/close of business on each count book (by counter)?	1		
		55-47	c. Year-end inventory present and dated on box(es)?	1		
		55-47	d. Biennial inventory present (April 30th, odd numbered years) and listed on storage boxes?	1		
		55-51	e. Consolidated count book signed, dated, and time of day by DCM or designee?	1		
		55-52	f. All inventory sheets have a count or a "NONE" for each listed item?	1		
		55-52	g. Inventory sheets signed by DCM or designee responsible for taking inventory?	1		
		55-53	h. Was an investigation conducted on controlled substances that appeared on the semi-annual physical "Count Audit" report?	1		
35	Inventories	55-51	Does an exempt manager conduct the second ARCOS count at least once every three months?	1		
36	Registrant Records	55-56	Are the dates of receipt, distribution, or other transactions (especially hand-written records) recorded on documents as the actual date of said transactions?	1		
37	Registrant Records	55-62	Are Class II B-619 receiving records NOT filed with monthly reports? Are they filed in separate temporary work files?	1		
38	Registrant Records	55-51	Are Copy 3 (blue) copies retained and filed with monthly records in date sequence?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
39	Receiving Records	55-62	Receipts from vendors: a. Are all controlled substance receipts double-checked and initialed?	1		
		55-62	b. Is the vendor's DEA number written-in on purchaser's copy of DEA Form 222?	1		
		55-62	c. Are the receiving copies of DEA Form 222 reviewed to ensure that they show actual date of receipt?	1		
		55-63	c. Are ditto marks or vertical lines NOT present in "Date Received" column?	1		
		55-63	d. Backorders of DEA Form 222 purchases photocopies and "B/O" written on photocopy?	1		
		55-63	e. Are forms processed with 60 days elapsed since DEA Form 222 was issued to supplier?	1		
		55-63	f. Is NDC # underlined or highlighted for Schedule III reportables?	1		
40	Return Credits	55-65	Is the "Date Received" box the date that goods entered the DC?	1		
41	Return Credits	55-66	Schedule II returns: a. Is the DC copy of DEA Form 222 (purchaser's copy) order form filed in vault?	1		
		55-66	b. Is the DC copy of DEA Form 222 checked-in and receipt verified using the same method as for vendors?	1		
		55-66	c. Filed by date in separate folder?	1		
42	Return Credits	55-66	Schedule III-V (including ARCOS): a. Are handwritten credit memos legibly written on a separate credit memo from non-schedule returns?	1		
		55-66	b. Are the complete customer name, address, DEA #, DC DEA #, full descriptions shown, and verified by supervisor/designee?	1		
		55-66	c. Do generic items indicate the manufacturer's name?	1		
		55-67	d. Do ARCOS reportable items indicate NDC # and are they underlined or highlighted?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
43	Sales & Distribution Transactions	55-69	Schedule II order filling: a. Are orders filled from DEA Form 222?	1		
		55-69	b. Are DEA Form 222 orders double-checked and initialed by a supervisor or designee for accuracy and correct size, strength, and quantity filled, and do they agree with pick document Schedule II order filling?	1		
		55-69	c. Is the month-day-year for each line item shipped recorded in the "Date Shipped" column—no ditto marks or vertical lines are used?	1		
		55-70	d. Is the DEA Form 222 retained in monthly records, and the picking document not retained in monthly records?	1		
44	Sales & Distribution Transactions	55-71	Schedule III ARCOS reportables: a. Are they double-checked, piece counted, and initialed by authorized employee prior to shipment?	1		
		55-71	b. Is the NDC # for ARCOS reportables written on the picking document?	1		
		55-71	c. Are they filed by date in a separate file by category (reportable and non-reportable)?	1		
45	Sales & Distribution Transactions	55-71	Is the pick document date the same as date of shipment?	1		
46	Sales & Distribution Transactions	55-75	Are returns to suppliers filed separately and retained in monthly ARCOS records?	1		
47	Order Form Regulations	55-83	Executing DEA Form 222: a. Does the Number Of Items Ordered/Last Line Completed equal the Number Of Items Ordered/Last Line Completed box?	1		
		55-84	b. Are any Roman numerals used to designate a quantity ordered for any item or number of lines completed box?	1		
		55-85 55-86	c. Are ditto marks or vertical lines in the "Date Received/Shipped" column?	1		
48	Order Form Regulations	55-86	Are Copy 1 of DEA Form 222 retained and filed with the DC's monthly records in date sequence; Copy 2 sent to Special Agent In Charge, local DEA division, with "Certified Mail/Return Receipt Requested."	1		
49	Order Form Regulations	55-89	Unaccepted and defective order forms (see DEA Form 222 audit checklist)?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
50	Order Form Regulations	55-92	Are DEA order form guidelines (Exhibit 55-12) posted in the cage and vault?	1		
51	Order Form Regulations	55-96	Is the DC's DEA power of attorney posted in the vault?	1		
52	Order Form Regulations	55-97	Are DEA Form 222's retained by the DC listed on the blank control log? Are any unexecuted Form 222's locked up with accessibility available only to the DCM or his/her attorney-in-fact?	1		
53	Computer Room Transactions	55-102	Are controlled substance documents, including those for the current month, maintained in the cage and vault (except while being key-entered)?	1		
54	Computer Room Transactions	55-104	Does the DCM or designee notify the Vice President, Distribution Operations, DDQ, or DFRC <u>before</u> a "V" code is used?	1		
55	DEA Error Reports	55-109	Is DEA Form 333 completed upon receipt of error report, and inserted in appropriate month's transactions with "Certified Mail/Return Receipt Requested"?	1		
56	Miscellaneous Topics	55-117	Is DEA Form 41 for destruction of controlled substances on file in appropriate month's records?	1		
57	Delivery Manifest	55-30	Is the manifest signed by each person handling controlled substances?	1		
58	Miscellaneous Reports On File	55-107	Is the final DU04 ARCOS Edit signed by the DCM or designee, indicating that Edit in Balance-file created?	1		
59	Miscellaneous Reports On File	55-107	Is the DCAM's adding machine tape matching the DU04 "Ending" and "Consolidated" count signed and dated by the DCAM, and attached to the Consolidated Count?	1		
60	Miscellaneous Reports On File	55-57	Are all records boxes marked with the appropriate month-date-year of records, and a destruction date of two years hence (or longer if required by state)?	1		
61	Miscellaneous Inventories	55-51	Do changes to All Count Book inventories indicate the reason for each change and the DCM's or designee's initials?	1		
62	Miscellaneous ARCOS Balancing	55-107	Is the monthly ARCOS Correction Form used in balancing the DU04 Edit, and does it identify the reason for each adjustment, and is each signed by the DCM or designee before key-entering?	1		
63	Miscellaneous Receipts From DC's	55-75	Are handwritten receivers from other McKesson DC's complete, including the street address and DEA # for both DC's?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
64	Miscellaneous Security	55-18	Are the batteries in hold-up alarms checked or changes at least semi-annually?	1		
65	Miscellaneous ARCOS Balancing	55-107	Are all DU04 ARCOS balancing edits signed by the DCM or designee?	1		
66	Miscellaneous Regulatory Reporting	55-67	Is it the DC's practice to document "Refused Orders" and orders that "did not reach their original destination" on the appropriate order's credit memo?	1		
67	Miscellaneous Communication	55-122	Is a visual notation made on shelves, including shelves in the DC's reclamation area, when more than one NDC # is present for an item, or the NDC # changes?	1		
68	Miscellaneous FAX Orders	55-87	Do facsimile orders for DEA Form 222 orders have a copy of the facsimile order for the McKesson driver to exchange for an original DEA Form 222? Is a notation of the facsimile order recorded on the DEA delivery manifest for such orders?	1		
69	Miscellaneous Paperwork	55-92	Is the controlled substance paperwork reviewed each day for correctness and completeness by the DCM or supervisor?	1		
70	Miscellaneous Daily Edits	55-102	Are ARCOS daily edits completed each day from the previous day's records, and does the Computer Room run a corrected edit for verification after corrections have been entered for review?	1		
71	Order Form Regulations	55-86	Do all customers who are serviced by common/contract drivers send their DEA Form 222 in a sealed envelope?	1		

## DRUG OPERATIONS MANUAL 55-CONTROLLED SUBSTANCES

#	CATEGORY	OM PAGE	AUDITED ITEM	MAX PTS	SCORE	COMMENTS
72	Miscellaneous Controlled Substance Records Present	55-55	Are the following controlled substance records in box:			
			a. DU04 Final Edit?	1		
			b. DR49 Sales/Purchase report?	1		
			c. Customer Recap Variance Report with cover letter?	1		
			d. Schedule III-V picking documents (by category, in date sequence)?	1		
			e. Schedule III-V Receiving Records (by category, in date sequence)?	1		
			f. Schedule III-V credit memo's (by category, in date sequence)?	1		
			g. Count books, with DCAM tape attached?	1		
			h. Copies of Billing Error Credits (no trade of product) and drop-ship invoices?	1		
			i. DEA Form 41 destruction, if applicable, and documents?	1		
			j. DU45 Suspicious Order Report?	1		
			k. DEA Form 222 order form copies 1 and 3 (brown and blue) stored in vault?	1		
			l. Copies of Daily/Monthly Controlled Substance Suspicious Order Warning Report with fax transmission log or mail receipt?	1		
			m. DEA Form 333 ARCOS Correction Sheets?	1		
73	Miscellaneous	55-108	Is the Monthly ARCOS Balancing form completed monthly and sent to the SVP, VPDO, DDQ, and Regional Security Manager?	1		
74	Summary	55-1 55-36	Are all persons associated with DEA compliance at the DC aware of their duties and reporting requirements?	1		

END OF CHECKLIST

Drug Operations Manual  
Exhibit 55-25  
1/15/97

ARCOS Physical Inventory Pre-List - First Count (8½" x 11")

DU10L1 VER 001  
02/23/88 15.12

MCKESSON CORPORATION  
ARCOS PHYSICAL INVENTORY

PAGE 1  
DU10R01A

FIRST COUNT

NAME

John Doe

DATE

2-29-98 TIME 3:10 PM

EPIC DESCRIPTION  
LABEL

NDC CODE

TOT  
CNT

MORG  
CNT

CASE  
CNT

SHELF  
CNT

1 X12

A26342 ASPIRIN W/COD 60MG PARM 100 00349833701

NON-CASE LOCATION

14 NONE 12 2

A31110 ASPIRIN W/COD 30MG PARM 1000 00349408210

NON-CASE LOCATION

NONE NONE NONE NONE

A43453 ASPIRIN W/COD 30MG PARM 100 00349408201

NON-CASE LOCATION

7 NONE NONE 7

\* A46399 ASPIRIN+COD 325/15MG PARM 1000 00349865510

NON-CASE LOCATION

NONE NONE NONE NONE

B33833 HYDROCOD+ACETAM 5/500 PARM 100 00349849401

NON-CASE LOCATION

NONE NONE NONE NONE

B37339 HYDROCOD+ACETAM 5/500 PARM 500 00349849405

NON-CASE LOCATION

NONE NONE NONE NONE

B72732 ASPIRIN+COD 325/15 TB PARM 100 00349865501

NON-CASE LOCATION

NONE NONE NONE NONE

A29673 Aspirin w/cod 30MG 500 00349408205

NON-CASE LOCATION

J200A3E

CASE LOCATION

2 NONE NONE 2

NON-CASE LOCATION

CASE LOCATION

EDP-277 (98-81)

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MCKMDL00652127

MC-WV-00451.00255

ARCOS Physical Inventory Pre-List - First Count (8½" x 11")DU10L1 VER 001  
02/23/88 15.12MCKESSON CORPORATION  
ARCOS PHYSICAL INVENTORYPAGE 1  
DU10R01A

FIRST COUNT	NAME	DATE	TIME
EPIC LABEL	DESCRIPTION	NDC CODE	TOT CNT
			MORG CNT
			CASE CNT
			SHELF CNT

A26342 ASPIRIN W/COD 60MG PARM 100 00349833701

NON-CASE LOCATION

A31110 ASPIRIN W/COD 30MG PARM 1000 00349408210

NON-CASE LOCATION

A43453 ASPIRIN W/COD 30MG PARM 100 00349408201

NON-CASE LOCATION

A46399 ASPIRIN+COD 325/15MG PARM 1000 00349865510

NON-CASE LOCATION

B33833 HYDROCOD+ACETAM 5/500 PARM 100 00349849401

NON-CASE LOCATION

B37339 HYDROCOD+ACETAM 5/500 PARM 500 00349849405

NON-CASE LOCATION

B72732 ASPIRIN+COD 325/15 TB PARM 100 00349865501

NON-CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

EDP-277 (20-81)

AROCS Physical Inventory Pre-List - Second Count (8½" x 11")DU10L1 VER 001  
02/23/88 15.12MCKESSON CORPORATION  
ARCOS PHYSICAL INVENTORYPAGE 3  
DU10R01A

SECOND COUNT	NAME	DATE	TIME
EPIC LABEL	DESCRIPTION	NDC CODE	TOT CNT
		MORG CNT	CASE CNT
			SHELF CNT

B65710 ACETAMIN+C TAB 60MG #4 U/R 100 00677063201

NON-CASE LOCATION R00984

CASE LOCATION 0302A2

A97491 ACETAMIN W/COD 60MG #4 U/R 500 00677063205

NON-CASE LOCATION R00985

A39535 ACETAMIN W/COD TAB #2 W/C 100 00047063424

NON-CASE LOCATION R009C4

A39733 ACETAMIN W/COD TAB #3 W/C 1000 00047063532

NON-CASE LOCATION R009C5

CASE LOCATION 0302A1

B19113 ACETAMIN+COD #3 U/D ROX 10X10 00054802225

NON-CASE LOCATION R009C5

C07587 APAP SK TAB CODEINE 60MG 500 00007049725

NON-CASE LOCATION R009D5

B61933 APC W/COD TABLOID 30MG #3 100 00081035655

NON-CASE LOCATION R009E4

CASE LOCATION 0302A1

NON-CASE LOCATION

CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

ARCOS Physical Inventory Pre-List - Consolidated Count (8½" x 11")DU10L1 VER 001  
02/23/88 15.12MCKESSON CORPORATION  
ARCOS PHYSICAL INVENTORYPAGE 1  
DU10R01A

CONSOLIDATED COUNT NAME ..... DATE ..... TIME .....

EPIC LABEL	DESCRIPTION	NOC CODE	TOT CNT	MORG CNT	CASE CNT	SHELF CNT
---------------	-------------	----------	------------	-------------	-------------	--------------

A26342 ASPIRIN W/COD 60MG PARM 100 00349833701

NON-CASE LOCATION

A31110 ASPIRIN W/COD 30MG PARM 1000 00349408210

NON-CASE LOCATION

A43453 ASPIRIN W/COD 30MG PARM 100 00349408201

NON-CASE LOCATION

A46399 ASPIRIN+COD 325/15MG PARM 1000 00349865510

NON-CASE LOCATION

B33833 HYDROCOD+ACETAM 5/500 PARM 100 00349849401

NON-CASE LOCATION

B37339 HYDROCOD+ACETAM 5/500 PARM 500 00349849405

NON-CASE LOCATION

B72732 ASPIRIN+COD 325/15 TB PARM 100 00349865501

NON-CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

EDP-277 (R8-81)

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MC-WV-00451.00259

Drug Operations Manual  
Exhibit 55-27  
1/15/97

ARCOS Physical Inventory Pre-List - First Count (8½" x 11")

DU10L1 VER 001  
02/23/88 15.12

MCKESSON CORPORATION  
ARCOS PHYSICAL INVENTORY

PAGE 1  
DU10R01A

FIRST COUNT

NAME JANE

DATE 2-29-88

TIME 2:05 PM

EPIC DESCRIPTION  
LABEL

NDC CODE

TOT  
CNT

MORG  
CNT

CASE  
CNT

SHELF  
CNT

2X12

A26342 ASPIRIN W/COD 60MG PARM 100 00349833701

NON-CASE LOCATION

27 NONE 24 3

A31110 ASPIRIN W/COD 30MG PARM 1000 00349408210

NON-CASE LOCATION

NONE NONE NONE NONE

2X24

A43453 ASPIRIN W/COD 30MG PARM 100 00349408201

NON-CASE LOCATION

57 NONE 48 9

A46399 ASPIRIN+COD 325/15MG PARM 1000 00349865510

NON-CASE LOCATION

NONE NONE NONE NONE

B33833 HYDROCOD+ACETAM 5/500 PARM 100 00349849401

NON-CASE LOCATION

3 1 NONE 2

B37339 HYDROCOD+ACETAM 5/500 PARM 500 00349849405

NON-CASE LOCATION

NONE NONE NONE 1

B72732 ASPIRIN+COD 325/15 TB PARM 100 00349865501

NON-CASE LOCATION

4 NONE NONE 4

NON-CASE LOCATION

CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

EDP-277 (R2-81)

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MCKMDL00652133

MC-WV-00451.00261

## ARCOS Physical Inventory Pre-List - Consolidated Count (8½" x 11")

DU10L1 VER 001  
02/23/88 15.12MCKESSON CORPORATION  
ARCOS PHYSICAL INVENTORYPAGE 1  
DU10R01ACONSOLIDATED COUNT NAME Bill Smith DATE 2-29-88 TIME 4:30 PM

EPIC LABEL	DESCRIPTION	NDC CODE	TOT CNT	MORG CNT	CASE CNT	SHELF CNT
------------	-------------	----------	---------	----------	----------	-----------

A26342 ASPIRIN W/COD 60MG PARM 100 00349833701

NON-CASE LOCATION

3

A31110 ASPIRIN W/COD 30MG PARM 1000 00349408210

NON-CASE LOCATION

1

A43453 ASPIRIN W/COD 30MG PARM 100 00349408201

NON-CASE LOCATION

7

A46399 ASPIRIN+COD 325/15MG PARM 1000 00349865510

NON-CASE LOCATION

NONE

B33833 HYDROCOD+ACETAM 5/500 PARM 100 00349849401

NON-CASE LOCATION

2

B37339 HYDROCOD+ACETAM 5/500 PARM 500 00349849405

NON-CASE LOCATION

NONE

B72732 ASPIRIN+COD 325/15 TB PARM 100 00349865501

NON-CASE LOCATION

4

NON-CASE LOCATION

CASE LOCATION

NON-CASE LOCATION

CASE LOCATION

EDP-277 (R8-81)

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MC-WV-00451.00263

THRESHOLD AMOUNTS

Chemical	Threshold by weight
(i) Anthranic acid and its salts	30 kilograms.
(ii) Benzyl cyanide	1 kilogram.
(iii) Ephedrine, its salts, optical isomers, and salts of optical isomers	1 kilogram.
(iv) Ergonovine and its salts	10 grams.
(v) Ergotamine and its salts	20 grams.
(vi) N-Acetylanthranic acid and its salts	40 kilograms.
(vii) Norpseudophedrine, its salts, optical isomers, and salts of optical isomers	2.5 kilograms.
(viii) Phenylacetic acid and its salts	1 kilogram.
(ix) Phenylpropanolamine, its salts, optical isomers, and salts of optical isomers	2.5 kilograms.
(x) Pipendine and its salts	500 grams.
(xi) Pseudoephedrine, its salts, optical isomers, and salts of optical isomers	1 kilogram.
(xii) 3,4-Methylenedioxyphenyl-2-propanone	20 kilograms.

## (2) Listed Essential Chemicals:

## (i) Imports and Exports

Chemical	Threshold by volume	Threshold by weight
(A) Acetic anhydride	250 gallons	1,023 kilograms.
(B) Acetone	500 gallons	1,500 kilograms.
(C) Benzyl chloride	N/A	4 kilograms.
(D) Ethyl ether	500 gallons	1,354 kilograms.
(E) Hydriodic acid	40 liters (57%)	22.8 kilograms.
(F) Potassium permanganate	N/A	500 kilograms.
(G) 2-Butanone (MEK)	500 gallons	1,455 kilograms.
(H) Toluene	500 gallons	1,591 kilograms.

## (ii) Domestic Sales

Chemical	Threshold by volume	Threshold by weight
(A) Acetic anhydride	250 gallons	1,023 kilograms.
(B) Acetone	50 gallons	150 kilograms.
(C) Benzyl chloride	N/A	1 kilogram.
(D) Ethyl ether	50 gallons	135.4 kilograms.
(E) Hydriodic acid	10 liters (57%)	5.7 kilograms.
(F) Potassium permanganate	N/A	55 kilograms.
(G) 2-Butanone (MEK)	50 gallons	145 kilograms.
(H) Toluene	50 gallons	159 kilograms.

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MC-WV-00451.00265

Suspicious Order Guidelines

For purposes of reporting, the following circumstances constitute scenerios of a suspicious nature:

1. Individuals who desire to pay cash and want to pick up the chemicals.
2. Established customers who deviate from previous purchasing patterns for listed chemicals.
3. New customers or unfamiliar representatives of established customers who order listed chemicals.
4. Customers who have difficulty in pronouncing chemical names, etc.
5. Customers who are vague about their company address, telephone number, and reason for desiring listed chemicals.
6. Customers who want listed chemicals shipped to Post Office Boxes, or addresses other than their business address.
7. Customers who prefer to pay by cashier's check, postal money order, etc.
8. Customers who will not furnish references or who are vague about furnishing references for credit purposes, etc.
9. Customers who desire listed chemicals for reasons at variance with accepted legitimate industry practice.
10. Customers who are not members of trade, professional, or business associations.
11. Customers who furnish false or suspicious addresses, telephone numbers, references, etc.
12. Customers who refuse or are reluctant to establish credit accounts.
13. Customers whose communication or correspondence, whether by telephone, mail, or other means, is not conducted or prepared in a professional business manner.
14. Customers who request unusual methods or routes of shipment or who provide unusual shipping, labeling or packaging instructions.
15. Customers who purchase unusual quantities or combinations of chemicals or glassware in view of customary practice and usage.

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PAGE 1

# MCKESSON DRUG COMPANY CUSTOMERS WITH DEA REGISTRATIONS WITH INCOMPLETE RXDA SCHEDULES

-----RXDA SCHEDULE/CODES: 2=X: 2M=Y: 3=B: 3N=C: 4=D: 5=E: 6=F: 7=G: 8=H: 9=I: 10=J: 11=K: 12=L: 13=M: 14=N: 15=O: 16=P: 17=Q: 18=R: 19=S: 20=T: 21=U: 22=V: 23=W: 24=X: 25=Y: 26=Z: 27=AA: 28=AB: 29=AC: 30=AD: 31=AE: 32=AF: 33=AG: 34=AH: 35=AI: 36=AJ: 37=AK: 38=AL: 39=AM: 40=AN: 41=AO: 42=AP: 43=AQ: 44=AR: 45=AS: 46=AT: 47=AU: 48=AV: 49=AW: 50=AX: 51=AY: 52=AZ: 53=BA: 54=BB: 55=BC: 56=BD: 57=BE: 58=BF: 59=BG: 60=BN: 61=BO: 62=BP: 63=BQ: 64=BR: 65=BS: 66=BT: 67=BU: 68=BV: 69=BW: 70=BX: 71=BY: 72=BZ: 73=CA: 74=CB: 75=CC: 76=CD: 77=CE: 78=CF: 79=CG: 80=CH: 81=CI: 82=CJ: 83=CK: 84=CL: 85=CM: 86=CN: 87=CO: 88=CP: 89=CQ: 90=CR: 91=CS: 92=CT: 93=CU: 94=CV: 95=CW: 96=CX: 97=CY: 98=CZ: 99=DA: 100=DB: 101=DC: 102=DD: 103=DE: 104=DF: 105=DG: 106=DH: 107=DI: 108=DJ: 109=DK: 110=DL: 111=DM: 112=DN: 113=DO: 114=DP: 115=DQ: 116=DR: 117=DS: 118=DT: 119=DU: 120=DV: 121=DW: 122=DX: 123=DY: 124=DZ: 125=EA: 126=EB: 127=EC: 128=ED: 129=EE: 130=EF: 131=EG: 132=EH: 133=EI: 134=EJ: 135=EK: 136=EL: 137=EM: 138=EN: 139=EO: 140=EP: 141=EQ: 142=ER: 143=ES: 144=ET: 145=EU: 146=EV: 147=EW: 148=EX: 149=EY: 150=EZ: 151=FA: 152=FB: 153=FC: 154=FD: 155=FE: 156=FF: 157=FG: 158=FH: 159=FI: 160=FJ: 161=FK: 162=FL: 163=FM: 164=FN: 165=FO: 166=FP: 167=FQ: 168=FR: 169=FS: 170=FT: 171=FU: 172=FV: 173=FW: 174=FX: 175=FY: 176=FZ: 177=GA: 178=GB: 179=GC: 180=GD: 181=GE: 182=GF: 183=GG: 184=GH: 185=GI: 186=GJ: 187=GK: 188=GL: 189=GM: 190=GN: 191=GO: 192=GP: 193=GQ: 194=GR: 195=GS: 196=GT: 197=GU: 198=GV: 199=GW: 200=GX: 201=GY: 202=GZ: 203=HA: 204=HB: 205=HC: 206=HD: 207=HE: 208=HF: 209=HG: 210=HH: 211=HI: 212=HJ: 213=HK: 214=HL: 215=HM: 216=HN: 217=HO: 218=HP: 219=HQ: 220=HR: 221=HS: 222=HT: 223=HU: 224=HV: 225=HW: 226=HX: 227=HY: 228=HZ: 229=IA: 230=IB: 231=IC: 232=ID: 233=IE: 234=IF: 235=IG: 236=IH: 237=II: 238=IJ: 239=IK: 240=IL: 241=IM: 242=IN: 243=IO: 244=IP: 245=IQ: 246=IR: 247=IS: 248=IT: 249=IU: 250=IV: 251=IW: 252=IX: 253=IY: 254=IZ: 255=JA: 256=JB: 257=JC: 258=JD: 259=JE: 260=JF: 261=JG: 262=JH: 263=JI: 264=JJ: 265=JL: 266=JM: 267=JN: 268=JO: 269=JP: 270=JQ: 271=JR: 272=JS: 273=JT: 274=JU: 275=JV: 276=JW: 277=JX: 278=JY: 279=JZ: 280=KA: 281=KB: 282=KC: 283=KD: 284=KE: 285=KF: 286=KG: 287=KH: 288=KI: 289=KJ: 290=KL: 291=KM: 292=KN: 293=KO: 294=KP: 295=KQ: 296=KR: 297=KS: 298=KT: 299=KU: 300=KV: 301=KW: 302=KX: 303=KY: 304=KZ: 305=LA: 306=LB: 307=LC: 308=LD: 309=LE: 310=LF: 311=LG: 312=LH: 313=LI: 314=LJ: 315=LK: 316=LL: 317=LM: 318=LN: 319=LO: 320=LP: 321=LQ: 322=LR: 323=LS: 324=LT: 325=LU: 326=LV: 327=LW: 328= LX: 329=LY: 330= LZ: 331=MA: 332=MB: 333=MC: 334=MD: 335=ME: 336=MF: 337=MG: 338=MH: 339=MI: 340=MJ: 341=MK: 342=ML: 343=MM: 344=MN: 345=MO: 346=MP: 347=MQ: 348=MR: 349=MS: 350=MT: 351=MU: 352=MV: 353=MW: 354=MX: 355=MY: 356=MZ: 357=NA: 358=NB: 359=NC: 360=ND: 361=NE: 362=NF: 363=NG: 364=NH: 365=NI: 366=NJ: 367=NK: 368=NL: 369=NM: 370=NO: 371=NP: 372=NQ: 373=NR: 374=NS: 375=NT: 376=NU: 377=NV: 378=NW: 379=NX: 380=NY: 381=NZ: 382=OA: 383=OB: 384=OC: 385=OD: 386=OE: 387=OF: 388=OG: 389=OH: 390=OI: 391=OJ: 392=OK: 393=OL: 394=OM: 395=ON: 396=OO: 397=OP: 398=OQ: 399=OR: 400=OS: 401=OT: 402=OU: 403=OV: 404=OW: 405=OX: 406=OY: 407=OZ: 408=PA: 409=PB: 410=PC: 411=PD: 412=PE: 413=PF: 414=PG: 415=PH: 416=PI: 417=PJ: 418=PK: 419=PL: 420=PM: 421=PN: 422=PO: 423=PP: 424=PQ: 425=PR: 426=PS: 427=PT: 428=PU: 429=PV: 430=PW: 431=PX: 432=PY: 433=PZ: 434=QA: 435=QB: 436=QC: 437=QD: 438=QE: 439=QF: 440=QG: 441=QH: 442=QI: 443=QJ: 444=QK: 445=QL: 446=QM: 447=QN: 448=QO: 449=QP: 450=QQ: 451=QR: 452=QS: 453=QT: 454=QU: 455=QV: 456=QW: 457=QX: 458=QY: 459=QZ: 460=RA: 461=RB: 462=RC: 463=RD: 464=RE: 465=RF: 466=RG: 467=RH: 468=RI: 469=RJ: 470=RK: 471=RL: 472=RM: 473=RN: 474=RO: 475=RP: 476=RQ: 477=RR: 478=RS: 479=RT: 480=RU: 481=RV: 482=RW: 483=RX: 484=RY: 485=RZ: 486=SA: 487=SB: 488=SC: 489=SD: 490=SE: 491=SF: 492=SG: 493=SH: 494=SI: 495=SJ: 496=SK: 497=SL: 498=SM: 499=SN: 500=SO: 501=SP: 502=SQ: 503=SR: 504=SS: 505=ST: 506=SU: 507=SV: 508=SW: 509=SX: 510=SY: 511=SZ: 512=TA: 513=TB: 514=TC: 515=TD: 516=TE: 517=TF: 518=TG: 519=TH: 520=TI: 521=TJ: 522=TK: 523=TL: 524=TM: 525=TN: 526=TO: 527=TP: 528=TQ: 529=TR: 530=TS: 531=TT: 532=TU: 533=TV: 534=TW: 535=TX: 536=TY: 537=TZ: 538=UA: 539=UB: 540=UC: 541=UD: 542=UE: 543=UF: 544=UG: 545=UH: 546=UI: 547=UJ: 548=UK: 549=UL: 550=UM: 551=UN: 552=UO: 553=UP: 554=UQ: 555=UR: 556=US: 557=UT: 558=UU: 559=UV: 560=UW: 561=UX: 562=UY: 563=UZ: 564=VA: 565=VB: 566=VC: 567=VD: 568=VE: 569=VF: 570=VG: 571=VH: 572=VI: 573=VJ: 574=VK: 575=VL: 576=VM: 577=VN: 578=VO: 579=VP: 580=VQ: 581=VR: 582=VS: 583=VT: 584=VU: 585=VV: 586=VW: 587=VX: 588=VY: 589=VZ: 590=WA: 591=WB: 592=WC: 593=WD: 594=WE: 595=WF: 596=WG: 597=WH: 598=WI: 599=WJ: 600=WK: 601=WL: 602=WM: 603=WN: 604=WO: 605=WP: 606=WQ: 607=WR: 608=WS: 609=WT: 610=WU: 611=WV: 612=WX: 613=WY: 614=WZ: 615=XA: 616=XB: 617=XC: 618=XD: 619=XE: 620=XF: 621=XG: 622=XH: 623=XI: 624=XJ: 625=XK: 626=XL: 627=XM: 628=XN: 629=XO: 630=XP: 631=XQ: 632=XR: 633=XS: 634=XT: 635=XU: 636=XV: 637=XW: 638=XX: 639=XY: 640=XZ: 641=YA: 642=YB: 643=YC: 644=YD: 645=YE: 646=YF: 647=YG: 648=YH: 649=YI: 650=YJ: 651=YK: 652=YL: 653=YM: 654=YN: 655=YO: 656=YP: 657=YQ: 658=YR: 659=YS: 660=YT: 661=YU: 662=YV: 663=YW: 664=YY: 665=YZ: 666=ZA: 667=ZB: 668=ZC: 669=ZD: 670=ZE: 671=ZF: 672=ZG: 673=ZH: 674=ZI: 675=ZJ: 676=ZK: 677=ZL: 678=ZM: 679=ZN: 680=ZO: 681=ZP: 682=ZQ: 683=ZR: 684=ZS: 685=ZT: 686=ZU: 687=ZV: 688=ZW: 689=ZX: 690=ZY: 691=ZZ: 692=AA: 693=AB: 694=AC: 695=AD: 696=AE: 697=AF: 698=AG: 699=AH: 700=AI: 701=AJ: 702=AK: 703=AL: 704=AM: 705=AN: 706=AO: 707=AP: 708=AQ: 709=AR: 710=AS: 711=AT: 712=AU: 713=AV: 714=AW: 715=AX: 716=AY: 717=AZ: 718=BA: 719=BB: 720=BC: 721=BD: 722=BE: 723=BF: 724=BG: 725=BH: 726=BI: 727=BJ: 728=BK: 729=BL: 730=BM: 731=BN: 732=BO: 733=BP: 734=BQ: 735=BR: 736=BS: 737=BT: 738=BU: 739=BV: 740=BW: 741=BX: 742=BY: 743=BZ: 744=CA: 745=CB: 746=CC: 747=CD: 748=CE: 749=CF: 750=CG: 751=CH: 752=CI: 753=CJ: 754=CK: 755=CL: 756=CM: 757=CN: 758=CO: 759=CP: 760=CQ: 761=CR: 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887=HO: 888=HP: 889=HQ: 890=HR: 891=HS: 892=HT: 893=HU: 894=HV: 895=HW: 896=HX: 897=HY: 898=HZ: 899=IA: 900=IB: 901=IC: 902=ID: 903=IE: 904=IF: 905=IG: 906=IH: 907=II: 908=IJ: 909=IK: 910=IL: 911=IM: 912=IN: 913=IO: 914=IP: 915=IQ: 916=IR: 917=IS: 918=IT: 919=IU: 920=IV: 921=IW: 922=IX: 923=IY: 924=IZ: 925=JA: 926=JB: 927=JC: 928=JD: 929=JE: 930=JF: 931=JG: 932=JH: 933=JI: 934=JJ: 935=JK: 936=JL: 937=JM: 938=JN: 939=JO: 940=JP: 941=JQ: 942=JR: 943=JS: 944=JT: 945=JU: 946=JV: 947=JW: 948=JX: 949=JY: 950=JZ: 951=KA: 952=KB: 953=KC: 954=KD: 955=KE: 956=KF: 957=KG: 958=KH: 959=KI: 960=KJ: 961=KL: 962=KM: 963=KN: 964=KO: 965=KP: 966=KQ: 967=KR: 968=KS: 969=KT: 970=KU: 971=KV: 972=KW: 973=KX: 974=KY: 975=KZ: 976=LA: 977=LB: 978=LC: 979=LD: 980=LE: 981=LF: 982=LG: 983= LH: 984=LI: 985=LJ: 986=LK: 987=LM: 988=LN: 989=LO: 990=LP: 991=LQ: 992=LR: 993=LS: 994=LT: 995=LU: 996=LV: 997=LW: 998= LX: 999=LY: 1000= LZ: 1001=MA: 1002=MB: 1003=MC: 1004=MD: 1005=ME: 1006=MF: 1007=MG: 1008=MH: 1009=MI: 1010=MJ: 1011=MK: 1012=ML: 1013=MM: 1014=MN: 1015=MO: 1016=MP: 1017=MQ: 1018=MR: 1019=MS: 1020=MT: 1021=MU: 1022=MV: 1023=MW: 1024=MX: 1025=MY: 1026=MZ: 1027=NA: 1028=NB: 1029=NC: 1030=ND: 1031=NE: 1032=NF: 1033=NG: 1034=NH: 1035=NI: 1036=NJ: 1037=NK: 1038=NL: 1039=NM: 1040=NO: 1041=NP: 1042=NQ: 1043=NR: 1044=NS: 1045=NT: 1046=NU: 1047=NV: 1048=NW: 1049=NX: 1050=NY: 1051=NZ: 1052=OA: 1053=OB: 1054=OC: 1055=OD: 1056=OE: 1057=OF: 1058=OG: 1059=OH: 1060=OI: 1061=OJ: 1062=OK: 1063=OL: 1064=OM: 1065=ON: 1066=OO: 1067=OP: 1068=OQ: 1069=OR: 1070=OS: 1071=OT: 1072=OU: 1073=OV: 1074=OW: 1075=OX: 1076=OY: 1077=OZ: 1078=PA: 1079=PB: 1080=PC: 1081=PD: 1082=PE: 1083=PF: 1084=PG: 1085=PH: 1086=PI: 1087=PJ: 1088=PK: 1089=PL: 1090=PM: 1091=PN: 1092=PO: 1093=PP: 1094=PQ: 1095=PR: 1096=PS: 1097=PT: 1098=PU: 1099=PV: 1100=PW: 1101=PX: 1102=PY: 1103=PZ: 1104=QA: 1105=QB: 1106=QC: 1107=QD: 1108=QE: 1109=QF: 1110=QG: 1111=QH: 1112=QI: 1113=QJ: 1114=QK: 1115=QL: 1116=QM: 1117=QN: 1118=QO: 1119=QP: 1120=QQ: 1121=QR: 1122=QS: 1123=QT: 1124=QU: 1125=QV: 1126=QW: 1127=QX: 1128=QY: 1129=QZ: 1130=RA: 1131=RB: 1132=RC: 1133=RD: 1134=RE: 1135=RF: 1136=RG: 1137=RH: 1138=RI: 1139=RJ: 1140=RK: 1141=RL: 1142=RM: 1143=RN: 1144=RO: 1145=RP: 1146=RQ: 1147=RR: 1148=RS: 1149=RT: 1150=RU: 1151=RV: 1152=RW: 1153=RX: 1154=RY: 1155=RZ: 1156=SA: 1157=SB: 1158=SC: 1159=SD: 1160=SE: 1161=SF: 1162=SG: 1163=SH: 1164=SI: 1165=SJ: 1166=SK: 1167=SL: 1168=SM: 1169=SN: 1170=SO: 1171=SP: 1172=SQ: 1173=SR: 1174=SS: 1175=ST: 1176=SU: 1177=SV: 1178=SW: 1179= SX: 1180=SY: 1181=SZ: 1182=TA: 1183=TB: 1184=TC: 1185=TD: 1186=TE: 1187=TF: 1188=TG: 1189=TH: 1190=TI: 1191=TJ: 1192=TK: 1193=TL: 1194=TM: 1195=TN: 1196=TO: 1197=TP: 1198=TQ: 1199=TR: 1200=TS: 1201=TT: 1202=TU: 1203=TV: 1204=TW: 1205=TX: 1206=TY: 1207=TZ: 1208=UA: 1209=UB: 1210=UC: 1211=UD: 1212=UE: 1213=UF: 1214=UG: 1215=UH: 1216=UI: 1217=UJ: 1218=UK: 1219=UL: 1220=UM: 1221=UN: 1222=UO: 1223=UP: 1224=UQ: 1225=UR: 1226=US: 1227=UT: 1228=UU: 1229=UV: 1230=UW: 1231=UX: 1232=UY: 1233=UZ: 1234=VA: 1235=VB: 1236=VC: 1237=VD: 1238=VE: 1239=VF: 1240=VG: 1241=VH: 1242=VI: 1243=VJ: 1244=VK: 1245=VL: 1246=VM: 1247=VN: 1248=VO: 1249=VP: 1250=VQ: 1251=VR: 1252=VS: 1253=VT: 1254=VU: 1255=VV: 1256=VW: 1257=VX: 1258=VY: 1259=VZ: 1260=WA: 1261=WB: 1262=WC: 1263=WD: 1264=WE: 1265=WF: 1266=WG: 1267=WH: 1268=WI: 1269=WJ: 1270=WK: 1271=WL: 1272=WM: 1273=WN: 1274=WO: 1275=WP: 1276=WQ: 1277=WR: 1278=WS: 1279=WT: 1280=WU: 1281=WV: 1282=WX: 1283=WY: 1284=WZ: 1285=XA: 1286=XB: 1287=XC: 1288=XD: 1289=XE: 1290=XF: 1291=XG: 1292=XH: 1293=XI: 1294=XJ: 1295=XK: 1296=XL: 1297=XM: 1298=XN: 1299=XO: 1300=XP: 1301=XQ: 1302=XR: 1303=XS: 1304=XT: 1305=XU: 1306=XV: 1307=XW: 1308=XX: 1309=XY: 1310=XZ: 1311=YA: 1312=YB: 1313=YC: 1314=YD: 1315=YE: 1316=YF: 1317=YG: 1318=YH: 1319=YI: 1320=YJ: 1321=YK: 1322=YL: 1323=YM: 1324=YN: 1325=YO: 1326=YP: 1327=YQ: 1328=YR: 1329=YS: 1330=YT: 1331=YU: 1332=YV: 1333=YW: 1334=YY: 1335=YZ: 1336=ZA: 1337=ZB: 1338=ZC: 1339=ZD: 1340=ZE: 1341=ZF: 1342=ZG: 1343=ZH: 1344=ZI: 1345=ZJ: 1346=ZK: 1347=ZL: 1348=ZM: 1349=ZN: 1350=ZO: 1351=ZP: 1352=ZQ: 1353=ZR: 1354=ZS: 1355=ZT: 1356=ZU: 1357=ZV: 1358=ZW: 1359=ZX: 1360=ZY: 1361=ZZ: 1362=AA: 1363=AB: 1364=AC: 1365=AD: 1366=AE: 1367=AF: 1368=AG: 1369=AH: 1370=AI: 1371=AJ: 1372=AK: 1373=AL: 1374=AM: 1375=AN: 1376=AO: 1377=AP: 1378=AQ: 1379=AR: 1380=AS: 1381=AT: 1382=AU: 1383=AV: 1384=AW: 1385=AX: 1386=AY: 1387=AZ: 1388=BA: 1389=BB: 1390=BC: 1391=BD: 1392=BE: 1393=BF: 1394=BG: 1395=BH: 1396=BI: 1397=BJ: 1398=BK: 1399=BL: 1400=BM: 1401=BN: 1402=BO: 1403=BP: 1404=BQ: 1405=BR: 1406=BS: 1407=BT: 1408=BU: 1409=BV: 1410=BW: 1411=BX: 1412=BY: 1413=BZ: 1414=CA: 1415=CB: 1416=CC: 1417=CD: 1418=CE: 1419=CF: 1420=CG: 1421=CH: 1422=CI: 1423=CJ: 1424=CK: 1425=CL: 1426=CM: 1427=CN: 1428=CO: 1429=CP: 1430=CQ: 1431=CR: 1432=CS: 1433=CT: 1434=CU: 1435=CV: 1436=CW: 1437=CX: 1438=CY: 1439=CZ: 1440=DA: 1441=DB: 1442=DC: 1443=DD: 1444=DE: 1445=DF: 1446=DG: 1447=DH: 1448=DI: 1449=DJ: 1450=DK: 1451=DL: 1452=DM: 1453=DN: 1454=DO: 1455=DP: 1456=DQ: 1457=DR: 1458=DS: 1459=DT: 1460=DU: 1461=DV: 1462=DW: 1463=DX: 1464=DY: 1465=DZ: 1466=EA: 1467=EB: 1468=EC: 1469=ED: 1470=EE: 1471=EF: 1472=EG: 1473=EH: 1474=EI: 1475=EJ: 1476=EK: 1477=EL: 1478=EM: 1479=EN: 1480=EO: 1481=EP: 1482=EQ: 1483=ER: 1484=ES: 1485=ET: 1486=EU: 1487=EV: 1488=EW: 1489=EX: 1490=EY: 1491=EZ: 1492=FA: 1493=FB: 1494=FC: 1495=FD: 1496=FE: 1497=FG: 1498=FH: 1499=FI: 1500=FJ: 1501=FK: 1502=FL: 1503=FM: 1504=FN: 1505=FO: 1506=FP: 1507=FQ: 1508=FR: 1509=FS: 1510=FT: 1511=FU: 1512=FV: 1513=FW: 1514=FX: 1515=FY: 1516=FZ: 1517=GA: 1518=GB: 1519=GC: 1520=GD: 1521=GE: 1522=GF: 1523=GG: 1524=GH: 1525=GI: 1526=GJ: 1527=GK: 1528=GL: 1529=GM: 1530=GN: 1531=GO: 1532=GP: 1533=GQ: 1534=GR: 1535=GS: 1536=GT: 1537=GU: 1538=GV: 1539=GW: 1540=GX: 1541=GY: 1542=GZ: 1543=HA: 1544=HB: 1545=HC: 1546=HD: 1547=HE: 1548=HF: 1549=HG: 1550=HH: 1551=HI: 1552=HJ: 1553=HK: 1554=HL: 1555=HM: 1556=HN: 1557=HO: 1558=HP: 1559=HQ: 1560=HR: 1561=HS: 1562=HT: 1563=HU: 1564=HV: 1565=HW: 1566=HX: 1567=HY: 1568=HZ: 1569=IA: 1570=IB: 1571=IC: 1572=ID: 1573=IE: 1574=IF: 1575=IG: 1576=IH: 1577=II: 1578=IJ: 1579=IK: 1580=IL: 1581=IM: 1582=IN: 1583=IO: 1584=IP: 1585=IQ: 1586=IR: 1587=IS: 1588=IT: 1589=IU: 1590=IV: 1591=IW: 1592=IX: 1593=IY: 1594=IZ: 1595=JA: 1596=JB: 1597=JC: 1598=JD: 1599=JE: 1600=JF: 1601=JG: 1602=JH: 1603=JI: 1604=JJ: 1605=JK: 1606=JL: 1607=JM: 1608=JN: 1609=JO: 1610=JP: 1611=JQ: 1612=JR: 1613=JS: 1614=JT: 1615=JU: 1616=JV: 1617=JW: 1618=JX: 1619=JY: 1620=JZ: 1621=KA: 1622=KB: 1623=KC: 1624=KD: 1625=KE: 1626=KF: 1627=KG: 1628=KH: 1629=KI: 1630=KJ: 1631=KL: 1632=KM: 1633=KN

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MC-WV-00451.00269

MC-WV-00451.00270

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DM0111 VER 024  
 REPORT NO. DM01A20A  
 RTE: 210 STP: 033

MCKESSON DRUG COMPANY  
 ECONOMICST TRANSACTION AUDIT REPORT

PAGE 13  
 DATE: 09/13/90  
 TIME: 15:02:04  
 RUN: DM10TRCQ

511076 TRENTON FAMILY #4 PHCY  
 405 E BROADWAY  
 TRENTON IL 62293

CONTROL-NO  
 1034300

DPC CONTROL NUMBER  
 90778

PO-NUM	SEQ-NUM	ITEM-NUM	INVALID CHARACTERS	ERR-NUM	ERROR MESSAGE
	1	110-8745	TYLENOL+COD #3 TAB U/D	500	DEA CERTIF REQ FOR THIS SCHEDULE
	2	110-4462	PHENOBARD ELIX	39	DEA CERTIF REQ FOR THIS SCHEDULE
	3	123-3287	TUSSI ORGANIOIN	39	DEA CERTIF REQ FOR THIS SCHEDULE
	4	170-7439	SECONAL	39	DEA CERTIF REQ FOR THIS SCHEDULE

LINE ERRORS	LENGTH ERRORS	RECORDED ERRORS	CK DIGIT ERRORS	TOTAL INPUT	TOTAL NET (-)	OPEN & CASE (+)	TOTAL NEG DTY (-)	TOTAL INVALID (-)	TOTAL OUTPUT (=)
----- MISCELLANEOUS ERRORS -----									
ORDERS				4	34				

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MC-WV-00451.00271

## DEA CONTINUING EDUCATION REPORT

Drug Operations Manual  
Exhibit 55-33  
1/15/97

Distribution Center Name and Number: \_\_\_\_\_

TO: DDQ

CC: VPDO  
DEA FILE

1. Date of education:

\_\_\_\_\_

2. Review type:

☐ Internal Audit ☐ DEA Audit ☐ DDQ Audit☐ DCM Review ☐ DFRC Audit

3. Employees in attendance:

(1) \_\_\_\_\_  
(2) \_\_\_\_\_  
(3) \_\_\_\_\_  
(4) \_\_\_\_\_(5) \_\_\_\_\_  
(6) \_\_\_\_\_  
(7) \_\_\_\_\_  
(8) \_\_\_\_\_

4. Procedures reviewed:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DC Manager's Signature

Date

(01

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MC-WV-00451.00273

## DEA INSPECTION REPORT

1. Initiation Date \_\_\_\_\_
2. Lead Compliance Investigator \_\_\_\_\_
3. Closing Date -- Exit Interview \_\_\_\_\_
4. Total On-Site Days \_\_\_\_\_
5. Total On-Site Person Hours \_\_\_\_\_
6. Audit Period s/mo. \_\_\_\_\_
7. Number Items Audited \_\_\_\_\_
8. NDC # and Literal Description  
\_\_\_\_\_  
\_\_\_\_\_
9. Number of 222's Audited \_\_\_\_\_
10. Number of 222's with Alleged Errors \_\_\_\_\_  
% \_\_\_\_\_
11. DEA Office \_\_\_\_\_
12. Number Sales Lines Audited \_\_\_\_\_  
Number Sales Lines Allegedly in Error \_\_\_\_\_  
% \_\_\_\_\_
13. Number Purchase Lines Audited \_\_\_\_\_  
Number Purchase Lines Allegedly in Error \_\_\_\_\_  
% \_\_\_\_\_
14. Number Credit Lines Audited \_\_\_\_\_  
Number Credit Lines Allegedly in Error \_\_\_\_\_  
% \_\_\_\_\_

## 15. Other Citations

A. Suspicious Order Monitoring  
Yes ☐ No ☐ CFR Cite \_\_\_\_\_B. Inventory  
Yes ☐ No ☐ CFR Cite \_\_\_\_\_C. Security  
Yes ☐ No ☐ CFR Cite \_\_\_\_\_D. Other Comments: \_\_\_\_\_  
\_\_\_\_\_

## 16. Resolution:

A. DEA Follow-up Yes ☐ No ☐B. DEA Letter Yes ☐ No ☐C. DEA Citation Yes ☐ No ☐

D. Total Alleged Violations \_\_\_\_\_

E. Memorandum of Understanding Yes ☐ No ☐F. Informal Hearing Yes ☐ No ☐G. Formal Hearing Yes ☐ No ☐H. Court Proceeding Yes ☐ No ☐ Location \_\_\_\_\_

I. Total Violations Acknowledged in M.O.U. \_\_\_\_\_

J. Fines Sought \$ \_\_\_\_\_

K. Fines Paid \$ \_\_\_\_\_

L. Consent Order Yes ☐ No ☐

Explanation \_\_\_\_\_

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### Visitor's Log & Consent to Search

McKesson Drug Company ("McKesson") is registered with the Federal Drug Enforcement Administration to distribute controlled substances in accordance with the Controlled Substances Act of 1970 and regulations promulgated thereunder. In order to maintain this registration it is required to, among other things, take steps to prevent diversion of controlled substances held by it and can be held civilly and criminally liable for shortages in such inventory.

I have been engaged by McKesson or my employer to perform work, labor or services in a McKesson facility. This will involve my being in or near secured storage areas in which controlled substances are held. In order to assist McKesson in fulfilling its obligations, I agree that I will not enter upon or near secured storage areas unless accompanied by an employee designated by McKesson for this purpose and will permit such designated employee to search, both before my entry to or near the secured area and prior to my departure from the premises, any tool boxes, briefcases or other containers carried by me.

I have read and understand the above statement.

[illegible]

Form D-3039 (R 5/91)

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MC-WV-00451.00277

## DISTRIBUTION CENTER

[illegible]

WALK TESTS MUST BE DONE AT LEAST ONCE PER MONTH

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MC-WV-00451.00279

## DISTRIBUTION CENTER

[illegible]

FILE THIS IN MANAGEMENT SECURED AREA.

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MC-WV-00451.00281



U.S. Department of Justice

Drug Enforcement Administration

Washington, D.C. 20537

Mr. Bruce Russell  
Director, Distribution Planning  
McKesson Drug and Health Care Group  
One Post Street  
San Francisco, California 94104

Dear Bruce:

This is in response to your letter of December 11, 1990, requesting training assistance and our response to specific questions regarding compliance with the Controlled Substances Act and its implementing regulations.

Due to the number of field training seminars that would be involved at your various locations it would not be possible to make Drug Enforcement Administration (DEA) personnel available for a seminar at each location. As an alternative, you may wish to consider having a representative from each location attend a seminar and in turn have those people train your essential employees at various locations. We would be willing to have the appropriate DEA personnel at this type of session. We may be available at the National Meeting in May 1991 to conduct a one or two-hour workshop on controlled substances compliance issues. If it can be arranged, we will attend these meetings. We will keep you apprised of our plans.

In reply to question #1, the correct procedure for executing official order forms, as directed by Title 21 CFR 1305.06(b), is to list the total number of items ordered in the space provided on the order form. This space is entitled "No of Lines Completed" and per the instructions noted on the back of the DEA-222, should correspond to the number of items ordered.

In reply to question #2, Title 21 CFR 1305.09(b) directs that no official order form shall be valid more than 60 days after its execution by the purchaser. To assure compliance we suggest you bring this matter to the attention of the supplier or the local DEA field office when it occurs. We will advise them of this requirement.

Questions #3 and #4 are similar since they are concerned with the purchaser listing an incomplete or inaccurate address for the supplier by listing a P.O. Box address in lieu of a

Mr. Bruce Russell

Page Two

street address or by entering an incorrect street address. In those instances, the supplier's name, address, etc. may be added when omitted and to assure that the problem is not repeated, the supplier should provide the purchaser with the correct address.

If I can be of further assistance, please let me know.

Sincerely,

*Michael E. Moy*  
Michael E. Moy, Chief  
Drug Operations Section



U.S. Department of Justice

Drug Enforcement Administration

---

Washington, D.C. 20537

Mr. Bruce Russell  
Director, Distribution Planning  
McKesson Corporation  
One Post Street  
San Francisco, California 94104

Dear Bruce:

Thank you for your recent letter concerning the appearance of Dennis M. Johnson at the McKesson convention in Tucson, Arizona. Let me address your queries in the order that they were presented by your correspondence.

As previously discussed, any "emergency situation" regarding Schedule II drugs being distributed without an Order Form must be coordinated prior to shipment with the local Drug Enforcement Administration (DEA) office. Approval is granted usually in both written and verbal fashion. The use of a fax transmission does not replace the necessity of following up an emergency distribution with appropriate Order Forms as required in 21 C.F.R. 1305.03.

When two lines are used on an Order Form to describe one item, the number of lines completed at the bottom is one.

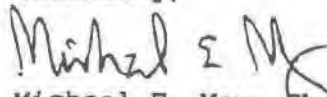
If, however, the registrant uses two lines to order one item and enters "two" in the number of lines completed, the Order Form could not be filled since it would be defective.

Drug Operations Manual  
Exhibit 55-38b, Page 2 of 2  
1/15/97

Mr. Bruce Russell

Page Two

Sincerely,

  
Michael E. Moy, Chief  
Drug Operations Section

U.S. Department of Justice  
Drug Enforcement Administration

Washington, D.C. 20537

SEP 14 1995

Ms. Diane Goyette  
National Wholesale Druggists'  
Association (NWDA)  
Director of Regulatory Affairs  
P.O. Box 2219  
Reston, Virginia 22090-0219

Dear Ms. Goyette:

The Drug Enforcement Administration (DEA) is pleased to announce that the DEA Form 222 (U.S. Official Order Form - Schedule I and II) used to purchase controlled substances from DEA registrants has been changed for clarification purposes. The former line entitled "Number of Lines Completed" has been changed to "Last Line Completed".  
*Items Ordered (N/A)*

This change was made as a result of requests made by DEA registrants to avoid confusion associated with the former requirement for an entry to be made for "number of lines completed". The new forms are already being distributed. Supplies of the old forms should continue to be used until they are depleted.

Please advise your membership of this change. We have enclosed a sample article which may be used for your publications. It is hoped that this change will obviate many problems associated with the former design of the form. If you have any further questions, please contact the Liaison and Policy Section at (202) 307-7297.

Sincerely,

G. Thomas Gitchel, Chief  
Liaison and Policy Section  
Office of Diversion Control

Enclosure

Drug Operations Manual  
Exhibit 55-38c, Page 2 of 2  
1/15/97

### DEA CHANGES ORDER FORM (DEA-222)

The Drug Enforcement Administration (DEA) has announced that, at the request of registrants, a change has been made to the U.S. Official Order Form for Schedule I and II controlled substances (DEA-222). This change has been made for clarification purposes and involves the replacement of the line entitled "Number of Lines Completed" with "Last Line Completed".

The instructions pertaining to the change which appear on the reverse of each individual form indicate under item "8" the following: "Enter the last line completed - this generally should correspond to the number of lines used. If a number has not been entered, the form will be returned to you for completion before the supplier is allowed to fill it."

While DEA hopes that this clarification will eliminate much of the confusion the language of this part of the order form has caused some registrants over the years, they realize that errors will still occur due to misinterpretation. When it is clear to the supplier that the number of the last line completed has been incorrectly noted due to misinterpretation, rather than an attempt to facilitate diversion, the DEA form 222 should not be rejected.

The new clarified forms have already begun to be distributed although old forms should continue to be used until depleted.

DEA Form 222 Copy for Registrants		For order forms may be issued for Schedule I and II substances unless a complete and complete form is used (Form 222-1)		DEA APPROVAL No. 1117-0010	
TO: (Name of Supplier)		CITY and STATE		DATE	
TO BE FILLED BY PURCHASER		TO BE FILLED BY SUPPLIER			
1	2	3	4	5	6
7	8	9	10	11	12
LAST LINE COMPLETED (MUST BE 10 OR LESS)		SIGNATURE OF PURCHASER OR ATTORNEY OR AGENT			
DEA Registration No.		Name and Address of Supplier			
Schedule		No. of this Order Form			
DEA Form 222 (Rev. 1/97)		U.S. OFFICIAL ORDER FORM - SCHEDULES I & II DRUG ENFORCEMENT ADMINISTRATION SUPPLIER'S COPY			

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**REPORT OF GOVERNMENT CONTACT**Drug Operations Manual  
Exhibit 55-39  
1/15/97**Distribution Center Name and Number:** \_\_\_\_\_

TO: Vice President Distribution Operations

CC: Gary Hilliard, McKesson Carrollton Operations, Carrollton, TX  
Ina Trugman, Law Department, 34th Floor, San Francisco, CA  
Operations Support, 28th Floor, San Francisco, CA

1. Time and date of contact by government representatives:

\_\_\_\_\_

2. Name of government representative(s):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

3. Name of government agency, division, and address at which representative(s) work(s):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

4. Purpose of contact:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

5. If tax is involved, state the nature of the tax, e.g., sales or real estate:

\_\_\_\_\_

\_\_\_\_\_

6. Additional comments:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date Signed

Signature

**ATTACH COPIES OF ANY DOCUMENTS RECEIVED OR GIVEN**

(01/)

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MC-WV-00451.00289

Drug Operations Manual  
Exhibit 55-40  
1/15/97

## McKesson Drug Company

### Employee Background Information Sheet

(Please print all information)

Name (Last, First, MI)		Maiden Name/Other Surnames Used	
Address			
City		State	Zip
Date of Birth	Place of Birth (City and State)		Social Security Number
Height	Weight	Eye Color	Hair Color
Driver's License Number(s) (Include licenses from all states where registered)			State(s) Issued
<b>DEA REQUIRED QUESTIONS:</b> The activities of employees that may have access to controlled substances come under the code of federal regulations of the Food and Drug Administration and/or the Drug Enforcement Administration. The following questions must be asked and verified in accordance with 21CFR, Section 1301.90. (The information furnished or recovered as a result of any inquiry will not necessarily preclude employment, but will be considered as part of an overall evaluation of your qualifications.)			
Within the past five years, have you been convicted of a felony, or within the past two years, of any misdemeanor or are you presently formally charged with committing a criminal offense? (Do not include any traffic violations, juvenile offenses or military convictions, except by general court-martial.)  <input type="checkbox"/> Yes <input type="checkbox"/> No   If yes, please furnish details of conviction, offense, location, date and sentence.			
In the past three years, have you ever knowingly used any narcotics, amphetamines or barbiturates, other than those prescribed to you by a physician?  <input type="checkbox"/> Yes <input type="checkbox"/> No   If yes, please furnish details.			
I certify that this information was completed by me and to the best of my knowledge all entries are true, correct and complete. I authorize McKesson Corporation to make a complete investigation of me regarding my background, former business relations and employment. I authorize any and all persons to give all information and records about me. I release McKesson Corporation, its officers, employees, agents, informants, Federal/State Law Enforcement Agencies, and in particular the Drug Enforcement Administration from any and all liability arising from this investigation.			
Signature		Date	Witnessed By  Date

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MC-WV-00451.00291

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## EPIC BULLETIN WRITE UP FORM

MASTER  
ARCOS NDC # CHANGE

<input checked="" type="checkbox"/> ITEM LOADS/MAINTENANCE	<input type="checkbox"/> VENDOR INSURANCE	DATE <input type="checkbox"/>
<input type="checkbox"/> PRICING	<input type="checkbox"/> VENDOR INFORMATION	NAME <input type="checkbox"/>
<input type="checkbox"/> CONTRACTS	<input type="checkbox"/> OPUS	PROF. MGR. INITIALS <input type="checkbox"/>

VENDOR NAME: \_\_\_\_\_

EXPLANATION THE FOLLOWING ARCOS REPORTABLE ITEM(S) HAVE HAD AN NDC NUMBER CHANGE IN MAINTENANCE  
# \_\_\_\_\_ . PLEASE UPDATE YOUR RECORDS.

LABEL CODE	VENDOR ITEM#	RECONOMOST#	ITEM DESCRIPTION	STATUS	NDC #
				Old	
				New	
				Old	
				New	
				Old	
				New	

RECEIVING: THERE SHOULD BE NO CHANGE IN RECEIVING PROCEDURES. DOUBLE CHECK TO BE SURE THE NDC NUMBER ON THE PRODUCT BEING RECEIVED MATCHES THE NDC NUMBER PRINTED ON THE RECEIVING RECORD. IF THEY ARE DIFFERENT, CHANGE THE RECEIVING RECORD TO THAT OF THE NDC NUMBER ON THE PRODUCT.

STOCK PUTAWAY: WHEN MERCHANDISING IS SHELVED IT MUST BE KEPT SEPERATELY FROM MERCHANDISE WITHN AN NDC NUMBER THAT IS DIFFERENT. THAT IS TO SAY IT CAN BE PLACED UNDER THE SAME EPIC LABEL CODE BUT SOME NOTIFICATION MUST BE PLACED ON OR NEAR THIS MERCHANDISE TO ALERT THE PICKER TO USE THE OLD NDC NUMBER MERCHANDISE FIRST.

DAILY EDIT A.R.C.O.S.: WHEN YOU SUBMIT YOUR RECEIVING RECORDS TO THE COMPUTER ROOM TO UPDATE YOUR INVENTORY FILE, YOUR A.R.C.O.S. FILE WILL ALSO BE UPDATED BECAUSE OF THE NEW NUMBER. TO LOAD THE NEW NDC NUMBER TO THE FILE.

Drug Operations Manual  
Exhibit 55-41  
1/15/97

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MC-WV-00451.00293

Drug Operations Manual  
Exhibit 55-42  
1/15/97

PROGRAM 0111L5 VER 004  
DATE 08/08/91 TIME 21.22

MCKESSON CORPORATION  
DEA CONTROL LOG  
SCHEDULE II NARCOTIC

PAGE  
REPORT NO. 0111R1

ROUTE 113

CUSTOMER NAME,  
NUMBER

STOP INV PAGE NUM NUM NUM PICK DRIV CUSTOMER  
NUM NUM NUM BAG TOTE CASE INIT INIT SIGNATURE

SAV ON DRUGS #3

095 00145 03001 ... ..

872333

WAL-MART 1222

12 105 00111 00001 ... ..

138779

WAL-MART 1222

12 105 00115 00001 ... ..

138779

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MC-WV-00451.00295

Drug Operations Manual  
Exhibit 55-43, Page 1 of 2  
1/15/97



U.S. Department of Justice

Drug Enforcement Administration

Washington, D.C. 20537

JUN 25 1992

Ms. Sherry Haber  
National Wholesale Druggist Association  
105 Oronoco Street  
Alexandria, Virginia 22314

Dear Ms. Haber:

It has been brought to the attention of the Drug Enforcement Administration (DEA) that some confusion exists regarding the proper completion of the DEA Form 222 with respect to the "number of lines completed." This letter is written to help alleviate some of the confusion.

Title 21 of the Code of Federal Regulations (CFR), section 1305.06(b) states that only one item shall be entered on each numbered line. It further states that the total number of items ordered shall be noted on the order form in the space provided. On the current version of the DEA Form 222, the aforementioned "space provided" is termed "number of lines completed." When the above requirements are followed to the letter, there is no discrepancy between the number of items ordered and the number of lines completed.

Problems in interpretation have been encountered when the purchaser either uses more than one line to describe an item or voids an item. In the first instance, the correct interpretation would be to list the number of items ordered on the form in the space labeled "number of lines completed." The DEA Form 222 will be revised in its next printing to rename the heading "number of items ordered."

The issue of voided lines on the order form is perhaps a bit less clear cut in its interpretation. In strictly interpreting the regulations, the only conclusion which can be reached which is not open for interpretation is that a supplier may not fill an order form which "shows any alteration, erasure, or change of any description" (21 CFR 1305.11(2)). In fact, instructions provided on the reverse side of the DEA Form 222 advise the purchaser

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MC-WV-00451.00296

Ms. Sherry Haber

Page Two

not to make erasures or alterations. They state that if an error should be made, all copies of the form should be voided and kept on file.

In addition, the regulations imply that only a supplier, not a purchaser, may void an item on a DEA Form 222. Section 1305.15(a) of the regulations states:

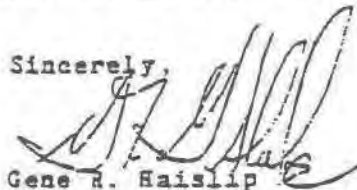
A purchaser may cancel part or all of an order on an order form by notifying the supplier in writing of such cancellation. The supplier shall indicate the cancellation on Copies 1 and 2 of the order form by drawing a line through the canceled items and printing "canceled" in the space provided for number of items shipped.

Consequently, the supplier is the only individual that has the authority to indicate the cancellation on the order form.

A separate but related issue has also been raised regarding generic substitution of order forms. DEA policy does not preclude generic substitution of identical products provided that the name and National Drug Code number of the actual product shipped is reflected on the form. Therefore, it would be acceptable to make a substitution provided that the customer agrees to accept a generic rather than a brand name product, the generic product of a manufacturer other than the one specified or a brand name product rather than a generic one. Therefore, the purchaser will not be required to submit a new DEA Form 222 to accommodate such a change.

Please disseminate the enclosed information to the members of your organization in an effort to dispel any problems they are perhaps encountering with the form. Thank you for your attention to this matter.

Sincerely,



Gene R. Haislip  
Deputy Assistant Administrator  
Office of Diversion Control

Date \_\_\_\_\_

To Our Valued Customer:

Recent activity by the Drug Enforcement Administration has heightened awareness of various issues relating to the preparation and handling of Controlled Substance DEA Form 222's. This letter is a means of sharing these issues and reviewing proper execution of DEA Form 222. Please understand that our actions are the result of ongoing vigorous regulatory enforcement by the government in this area.

The Comprehensive Drug Abuse Prevention Control Act of 1970 ("Controlled Substance Act") and the supporting Code of Federal Regulations (CFR's) contains nine major control mechanisms which apply to the distribution of substances subject to the Act. They are 1) registration of handlers; 2) record-keeping requirements; 3) manufacturing quotas; 4) distribution restrictions; 5) dispensing restrictions; 6) limitations on imports; 7) conditions of storage of drugs; 8) reports of transactions to the government; and 9) criminal, civil and administrative penalties for violation.

Each of these mechanisms has a considerable impact on the wholesale drug distribution industry, especially the penalties and loss of registration provisions. Each violation of the Act is punishable by up to 15 years imprisonment, \$25,000 in fines and in certain instances loss of registration.

*In a continuing effort to meet the compliance requirements of the Act and to demonstrate our commitment to customer satisfaction, the following is provided as a resource for meeting specific criteria in executing a DEA Form 222 as established by the DEA and are some examples of errors which will require that we return DEA Form 222 to you and request a new one before shipping merchandise.*

If DEA Form 222:

- Has a number in the number of lines completed, number of items ordered or last line completed box that is different than the corresponding items ordered. You must specify the exact information stated for the box, i.e.: in number of lines completed it must be the actual number of lines used on the form; in number of items ordered it must be how many s.k.u.'s were ordered on that form regardless of quantity for each item or how many lines were used to fill out the form; in last line completed it must reflect the number of the last line you wrote on when filling out the form.
- Has a Roman Numeral in the number of lines completed, number of items ordered or last line completed box.
- Has a blank in the number of lines completed, number of items ordered or last line completed box.
- Is not completed, legible or properly prepared, executed or endorsed.
- Shows any alteration, erasure or change of any area on the form.
- Shows a voided or canceled line by the purchaser.
- Shows any alteration to the pre-printed information on the DEA Form 222.
- Is illegible or unable to identify customer, customer's registration number, items specified, quantities specified, quantities or improper execution or endorsement.
- Has alterations, erasures or changes resulting in questions regarding the identity of customer, customer's registration number, items or quantities.
- Has not been signed by the purchaser.
- Has a calendar date older than sixty (60) days.

***Please remember, per the Code of Federal Regulations, any alterations to your order form will require us to return the form to you and request a new form.***

Please be assured that the last thing we want to do is return DEA 222 order forms. We are not trying to be arbitrary; we are trying to meet the legal requirements of the Code of Federal Regulations. By working together, we at McKesson will do everything in our power to continue to provide you with the best service in the industry.

Please keep in mind that in the event you need to have a line canceled on your order form, as per 21 CFR Part 1305.15a: "A purchaser may cancel part or all of an order on an order form by notifying the supplier in writing of such cancellation. The supplier shall indicate the cancellation on Copies 1 and 2 of the order form by drawing a line through the canceled items and printing 'canceled' in the space provided for number of items shipped".

If you have any questions, please don't hesitate to call \_\_\_\_\_ (phone #).

Thank you.

Distribution Center Manager

McKesson Drug Company

\_\_\_\_\_ Distribution Center



## DEA Regional Offices

### **Atlanta Division**

Russell Federal Building  
75 Spring St. S.W., Room 740  
Atlanta, GA 30303  
(404) 331-4401  
(404) 331-7340 Fax  
*Area Covered: Georgia, North  
Carolina, South Carolina, Tennessee*

### **Charleston Resident Office**

334 Meeting St., Room 325  
Charleston, SC 29403  
(803) 727-4531  
(803) 727-4186 Fax

### **Charlotte Resident Office**

Nine Woodlawn Green, Suite 200  
Charlotte, NC 28217  
(704) 344-6188  
(704) 344-6795 Fax

### **Columbia Resident Office**

1835 Assembly St., Suite 1472  
Columbia, SC 29201  
(803) 765-5251  
(803) 765-5410 Fax

### **Columbus Resident Office**

120 12th St., Room 316  
Columbus, GA 31902  
P.O. Box 1565  
Columbus, GA 31902  
(706) 649-7850  
(706) 649-7872 Fax

### **Greensboro Resident Office**

1801 Stanley Road, Suite 201  
Greensboro, NC 27407  
(910) 547-4210  
(910) 547-4215 Fax

### **Knoxville Resident Office**

710 Locust St., Suite 323  
Knoxville, TN 37902  
(615) 545-4607  
(615) 545-4606 Fax

### **Memphis Resident Office**

Morgan Keegan Tower, Suite 500  
50 N. Front St.  
Memphis, TN 38103  
(901) 544-3396  
(901) 544-3025 Fax

### **Nashville Resident Office**

Estes Kefauver Building  
801 Broadway, Room 500  
Nashville, TN 37203  
(615) 736-5988  
(615) 736-2221 Fax

### **Savannah Resident Office**

Smith Kelly Building  
300 Drayton St., Suite 401  
Savannah, GA 31401  
(912) 652-4286

### **Wilmington Resident Office**

Two Princess St., Room 322  
Wilmington, NC 28401  
(910) 343-4513  
(910) 343-4463 Fax

### **Chicago Division**

Dirksen Federal Building  
219 S. Dearborn St., Suite 500  
Chicago, IL 60604  
(312) 353-7875  
(312) 886-8439 Fax  
*Areas Covered: Illinois, Indiana,  
Minnesota, North Dakota,  
Wisconsin*

### **Fargo Resident Office**

One N. Second St., Suite 302  
Fargo, ND 58102  
(701) 239-5331

### **Hammond Resident Office**

507 State St., Room G32  
Hammond, IN 46320  
(219) 937-5321

### **Indianapolis Resident Office**

575 N. Pennsylvania St., Room 290  
Indianapolis, IN 46204  
(317) 226-7977  
(317) 226-7703 Fax

### **Milwaukee Resident Office**

1000 N. Water St., Suite 1010  
Milwaukee, WI 53202  
(414) 297-3395  
(414) 297-1169 Fax

### **Minneapolis Resident Office**

Federal Building  
110 S. Fourth St., Room 402  
Minneapolis, MN 55401  
(612) 348-1700

### **Springfield Resident Office**

400 W. Monroe St., Suite 302  
Springfield, IL 62704  
(217) 492-4504

### **Dallas Division**

1880 Regal Row  
Dallas, TX 75235  
(214) 767-7151  
(214) 767-7139 Fax  
*Areas Covered: Oklahoma, Texas  
(northern)*

D-5  
May, 1995



## DEA Regional Offices

### Fort Worth Resident Office

819 Taylor St., Room 13A33  
Fort Worth, TX 76102  
(817) 334-3455  
(817) 334-4128 Fax

### Lubbock Resident Office

5214 68th St., Suite 401  
Lubbock, TX 79424  
(806) 798-7189

### Oklahoma City Resident Office

Federal Building  
200 N.W. Fifth St., Room 960  
Oklahoma City, OK 73102-3202  
(405) 231-4141

### Tulsa Resident Office

5100 E. Skelly Drive, Suite 570  
Tulsa, OK 74135-6548  
(918) 581-6391

### Tyler Resident Office

909 ESE Loop 323, Suite 280  
Tyler, TX 75701  
(903) 534-0472

### Detroit Division

Federal Building  
231 W. Lafayette, Room 357  
Detroit, MI 48226  
(313) 226-7290  
(313) 226-6145 Fax  
*Areas Covered: Kentucky, Michigan, Ohio*

### Cincinnati Resident Office

Federal Office Building  
550 Main St., Room 8504  
Cincinnati, OH 45202  
(513) 684-3671  
(513) 684-3672 Fax

### Cleveland Resident Office

310 Lakeside Ave., #395  
Cleveland, OH 44113  
(216) 522-3705

### Columbus Resident Office

78 E. Chestnut St.  
Columbus, OH 43215  
(614) 469-2595  
(614) 469-5788 Fax

### Grand Rapids Resident Office

65 Monroe Center, N.W.  
Grand Rapids, MI 49503  
(616) 456-2541

### Louisville Resident Office

Federal Building  
600 Dr. Martin Luther King Place  
Room 1006  
Louisville, KY 40202  
(502) 582-5908

### Saginaw Resident Office

301 E. Genessee, Fourth Floor  
Saginaw, MI 48607  
(517) 758-4133  
(517) 758-4013

### Houston Division

333 W. Loop N., Suite 300  
Houston, TX 77024  
(713) 681-1771  
(713) 220-2378 Fax  
*Area Covered: Texas (southern)*

### Alpine Resident Office

P.O. Box 240  
Alpine, TX 79831  
(915) 837-3421  
(915) 837-2701 Fax

### Austin Resident Office

9171 N. Capital of Texas Highway  
Suite A-300  
Austin, TX 78759  
(512) 346-2486  
(512) 346-0825 Fax

### Brownsville Resident Office

1100 FM 802, Suite 200  
Brownsville, TX 78521  
(210) 504-4100  
(210) 504-4118 Fax

### Corpus Christi Resident Office

400 Mann St., Suite 405  
Corpus Christi, TX 78401  
P.O. Box 2443  
Corpus Christi, TX 78403  
(512) 888-3236  
(512) 888-3246 Fax

### Eagle Pass Resident Office

342 Rio Grande, Room 102  
Eagle Pass, TX 78852  
(210) 773-5378  
(210) 773-3008 Fax



## DEA Regional Offices

### **El Paso District Office**

700 E. San Antonio St., Suite D-701  
El Paso, TX 79901  
(915) 534-6400  
(915) 534-6034 Fax

### **Galveston Resident Office**

6000 Broadway, Suite 104  
Galveston, TX 77551  
(409) 766-3568  
(409) 766-3570 Fax

### **Laredo Resident Office**

4804 N. Bartlett, Building 1050  
Laredo, TX 78044  
P.O. Drawer 2307  
Laredo, TX 78044-2307  
(210) 722-5201  
(210) 726-2221 Fax

### **McAllen District Office**

1919 Austin St.  
McAllen, TX 78501-7030  
(210) 618-8400  
(210) 618-8478 Fax

### **San Antonio District Office**

10127 Morocco, Suite 200  
San Antonio, TX 78216  
(210) 525-2900

### **Los Angeles Division**

255 E. Temple St., 20th Floor  
Los Angeles, CA 90012  
(213) 894-2650  
(213) 894-4244 Fax  
*Areas Covered: California (southern),  
Georgia, Hawaii, Nevada*

### **Honolulu Resident Office**

Honolulu, HI 96813  
P.O. Box 50163  
Honolulu, HI 96850  
(808) 541-1930

### **Las Vegas Resident Office**

600 Las Vegas Blvd. S., Suite 640  
Las Vegas, NV 89101  
P.O. Box 16023  
Las Vegas, NV 89101-0023  
(702) 388-6635

### **Reno Resident Office**

401 Ryland St., Suite 331  
Reno, NV 89502  
(702) 784-5617  
(702) 784-5679 Fax

### **Riverside Resident Office**

6377A Riverside Ave., Suite 220  
Riverside, CA 92506-3162  
P.O. Box 2946  
Riverside, CA 92516-2946  
(909) 276-6642

### **Santa Ana Resident Office**

34 Civic Center Plaza  
Santa Ana, CA 92712  
(714) 836-2892  
(714) 836-2925 Fax

### **Santa Barbara Resident Office**

6445 Calle Real, Suite C  
Goleta, CA 93117  
(805) 964-6299  
(805) 683-4637 Fax

### **Miami Division**

8400 N.W. 53rd St.  
Miami, FL 33166  
(305) 590-4870  
(305) 590-4500 Fax  
*Area Covered: Caribbean, Florida*

### **Fort Lauderdale District Office**

1475 W. Cypress Creek Road  
Fort Lauderdale, FL 33309  
(305) 356-7700

### **Fort Myers Resident Office**

12730 New Brittany Blvd.  
Suite 501  
Fort Myers, FL 33907  
(813) 275-3662  
(813) 275-8945 Fax

### **Gainesville Resident Office**

235 S. Main St., Suite 202  
Gainesville, FL 32601  
(904) 371-2077

### **Jacksonville Resident Office**

4077 Woodcock Drive, Suite 210  
Jacksonville, FL 32207  
(904) 232-3566  
(904) 232-2501 Fax

### **Key Largo Resident Office**

95360 Overseas Highway, Suite Six  
Key Largo, FL 33037  
P.O. Box 2930  
Key Largo, FL 33037  
(305) 852-7874  
(305) 536-5485 Fax

### **Orlando Resident Office**

498 Palm Springs Drive, Suite 301  
Altamonte Springs, FL 32701  
(407) 648-6155  
(407) 648-6041 Fax

D-7  
May, 1995



## DEA Regional Offices

### Panama City Resident Office

5323 W. Highway 98, Suite 215  
Panama City, FL 32401  
(904) 769-3407  
(904) 769-4118 Fax

### San Juan District Office

2432 Loiza St.  
San Juan, PR 00913  
(809) 253-4200  
(809) 253-4254 Fax

### Tallahassee Resident Office

3384 Capitol Circle N.E.  
Tallahassee, FL 32308  
(904) 942-8417  
(904) 942-8420 Fax

### Tampa District Office

5426 Bay Center Drive  
Tampa, FL 33609  
(813) 228-2178  
(813) 228-2298 Fax

### West Palm Beach Resident Office

1818 S. Australian Ave., Suite 300  
West Palm Beach, FL 33409  
(407) 684-8000

### New England Division

50 Staniford St., Suite 200  
Boston, MA 02114  
(617) 557-2100  
(617) 557-2135 Fax  
*Areas Covered: Connecticut, Maine,  
Massachusetts, New Hampshire  
Rhode Island, Vermont*

### Bridgeport Resident Office

915 Lafayette Blvd., Room 200  
Bridgeport, CT 06604  
(203) 579-5591  
(203) 579-5530 Fax

### Burlington Resident Office

P.O. Box 446  
Williston, VT 05495  
(802) 951-6777  
(802) 951-6489 Fax

### Concord Resident Office

197 Loudon Road, Suite 300  
Concord, NH 03301  
(603) 225-1574  
(603) 225-1543 Fax

### Hartford Resident Office

450 Main St., Room 628  
Hartford, CT 06103  
(203) 240-3233

### Portland Resident Office

1355 Congress St., Suite D  
Portland ME 04102  
(207) 780-3331  
(207) 780-3413 Fax

### Providence Resident Office

380 Westminster Mall, Suite 541  
Providence, RI 02903  
(401) 528-4130  
(401) 528-4107 Fax

### Springfield Resident Office

1441 Main St., Suite 1000  
Springfield, MA 01103  
(413) 785-0284  
(413) 785-0483 Fax

### New Jersey Division

Federal Office Building  
970 Broad St., Suite 806  
Newark, NJ 07102  
(201) 645-6060  
(201) 645-2317 Fax  
*Area Covered: New Jersey*

### Atlantic City Resident Office

Executive Plaza  
2111 New Road, Suite 203  
North Field, NJ 08225  
(609) 383-3322

### Camden Resident Office

1000 Crawford Place, Suite 200  
Mount Laurel, NJ 08054  
(609) 757-5407  
(609) 757-5006 Fax

### New Orleans Division

Three Lakeway Center  
3838 N. Causeway Blvd., Suite 1800  
Metairie, LA 70002  
(504) 840-1100  
(504) 840-1103 Fax  
*Area Covered: Alabama, Arkansas,  
Louisiana, Mississippi*

### Baton Rouge Resident Office

2237 S. Acadian Thruway, Suite 306  
Baton Rouge, LA 70808  
(504) 389-0254  
(504) 389-0772 Fax

### Birmingham Resident Office

236 Goodwin Crest, Suite 520  
Birmingham, AL 35209  
(205) 290-7150

D-8  
May, 1995



## DEA Regional Offices

.....

### **Jackson Resident Office**

100 W. Capitol St., Suite 1213  
Jackson, MS 39269  
(601) 965-4400

### **Little Rock Resident Office**

10825 Financial Parkway, Suite 317  
Little Rock, AR 72211-3557  
(501) 324-5981  
(501) 324-6900 Fax

### **Mobile Resident Office**

1110 Montlimar Drive, Suite 270  
Mobile, AL 36609  
(205) 441-5831

### **Shreveport Resident Office**

Federal Building  
500 Fanin St., Room 6B14  
Shreveport, LA 71101  
(318) 676-4080  
(318) 676-4085 Fax

### **New York Division**

99 10th Ave.  
New York, NY 10011  
(212) 337-3900  
(212) 337-2799 Fax  
*Area Covered: New York*

### **Albany Resident Office**

O'Brien Building  
Clinton Avenue & N. Pearl Street  
Room 930  
Albany, NY 12207  
(518) 472-3425

### **Buffalo Resident Office**

28 Church St., Suite 300  
Buffalo, NY 14202  
(716) 846-4421  
(716) 846-5160 Fax

### **Long Island Resident Office**

175 Pinelawn Road, Suite 205  
Melville, NY 11747  
(516) 420-4500

### **Rochester Resident Office**

P.O. Box 14210  
Rochester, NY 14614  
(716) 263-3180

### **Philadelphia Division**

Green Federal Building  
600 Arch St., Room 10224  
Philadelphia, PA 19106  
(215) 597-9530  
(215) 597-6063 Fax  
*Area Covered: Delaware,  
Pennsylvania*

### **Allentown Resident Office**

1259 S. Cedar Crest Blvd., Suite 250  
Allentown, PA 18103  
(215) 770-0940

### **Harrisburg Resident Office**

P.O. Box 557  
Harrisburg, PA 17108-0557  
(717) 782-2270  
(717) 782-4851 Fax

### **Pittsburgh Resident Office**

Federal Building  
1000 Liberty Ave., Room 1328  
Pittsburgh, PA 15222  
(412) 644-3390

### **Wilmington Resident Office**

One Rodney Square  
920 King St., Suite 404  
Wilmington, DE 19801  
(302) 573-6184  
(302) 573-6296 Fax

### **Phoenix Division**

3010 N. Second St., Suite 301  
Phoenix, AZ 85012  
(602) 640-5700  
(602) 640-5741 Fax  
*Area Covered: Arizona*

### **Nogales Resident Office**

1370 W. Fairway Drive  
Nogales, AZ 85621  
(602) 281-1727  
(602) 281-1850 Fax

### **Tucson District Office**

3285 E. Hemisphere Loop  
Tucson, AZ 85706  
(602) 573-5500  
(602) 573-5632 Fax

### **Yuma Resident Office**

3150 Windsor Ave., Suite 202  
Yuma, AZ 85365  
(602) 344-9550  
(602) 344-1444 Fax

### **Rocky Mountain Division**

115 Inverness Drive  
East Englewood, CO 80112  
(303) 784-6300  
(303) 784-6414 Fax  
*Area Covered: Colorado, New Mexico,  
Utah, Wyoming*

D-9  
May, 1995



## DEA Regional Offices

### Albuquerque District Office

301 Grand Ave.  
NE Albuquerque, NM 87102  
(505) 766-8925  
(505) 766-8960 Fax

### Cheyenne Resident Office

Federal Center  
2120 Capitol Ave.  
Room 7010  
Cheyenne, WY 82001  
(307) 772-2391  
(307) 772-2399 Fax

### Glenwood Springs Resident Office

401 23rd St., Suite 300  
Glenwood Springs, CO 81601  
(303) 945-0744  
(303) 945-8247 Fax

### Las Cruces Resident Office

201 E. Picacho St.  
Las Cruces, NM 88001  
P.O. Box 399  
Las Cruces, NM 88004  
(505) 524-2610  
(505) 527-4850 Fax

### Salt Lake City Resident Office

American Plaza III  
47 W. 200 S., Suite 401  
Salt Lake City, UT 84101  
(801) 524-4156  
(801) 524-5364 Fax

### St. Louis Division

United Missouri Bank Building  
7911 Forsyth Blvd., Room 500  
St. Louis, MO 63105  
(314) 425-3241  
(314) 425-3245 Fax  
*Area Covered: Illinois (southern),  
Iowa, Kansas, Missouri, Nebraska,  
South Dakota*

### Cape Girardeau Resident Office

339 Broadway, Room 158  
Cape Girardeau, MO 63701  
(314) 334-1534  
(314) 335-4117 Fax

### Des Moines Resident Office

Federal Building  
210 Walnut St., Room 937  
Des Moines, IA 50309  
(515) 284-4700  
(515) 284-4920 Fax

### Kansas City Resident Office

8600 Farley St., Suite 200  
Overland Park, KS 66212  
(913) 236-3257  
(913) 236-3186 Fax

### Omaha Resident Office

106 S. 15th St., Room 1003  
Omaha, NE 68102  
(402) 221-4222  
(402) 221-4225 Fax

### Sioux Falls Resident Office

Shriver's Building  
230 S. Phillips Ave., Suite 407  
Sioux Falls, SD 57102  
(605) 330-4421  
(605) 330-4420 Fax

### Wichita Resident Office

1919 N. Amidon, Suite 218  
Wichita, KS 67203  
(316) 838-2500

### San Diego Division

402 W. 35th St.  
National City, CA 91950  
(619) 585-4200  
(619) 585-4224 Fax  
*Area Covered: California (border area)*

### Calexico Resident Office

333 S. Waterman Ave.  
El Centro, CA 92243  
(619) 352-5832

### Carlsbad Resident Office

5973 Avenida Encinas, Suite 220  
Carlsbad, CA 92008  
(619) 931-9812  
(619) 931-5974 Fax

### San Ysidro Resident Office

406 Virginia Ave.  
San Ysidro, CA 92173  
(619) 428-7115

### San Francisco Division

450 Golden Gate Ave.  
San Francisco, CA 94102  
P.O. Box 36035  
San Francisco, CA 94102  
(415) 556-6771  
(415) 556-2890 Fax  
*Area Covered: California*



## DEA Regional Offices

.....

### **Fresno Resident Office**

1260 M. St., Room 200  
Fresno, CA 93721  
(209) 487-5402  
(209) 487-5287 Fax

### **Sacramento Resident Office**

1860 Howe Ave., Suite 250  
Sacramento, CA 95825  
(916) 978-4225  
(916) 978-4316 Fax

### **San Jose Resident Office**

One N. First St., Suite 405  
San Jose, CA 95113  
(408) 291-7235  
(408) 291-7720 Fax

### **Seattle Division**

220 W. Mercer, Suite 104  
Seattle, WA 98119  
(206) 553-5443  
(206) 553-1576 Fax  
*Area Covered: Alaska, Idaho,  
Montana, Oregon, Washington*

### **Anchorage Resident Office**

222 W. Seventh Ave., #15  
Anchorage, AK 99513  
(907) 271-5033  
(907) 271-3097 Fax

### **Blaine Resident Office**

170 C St.  
Blaine, WA 98230  
P.O. Box 1680  
Blaine, WA 98231  
(206) 332-8692

### **Eugene Resident Office**

Federal Building  
211 E. Seventh Ave., Room 230  
Eugene, OR 97401  
(503) 465-6861  
(503) 465-6796 Fax

### **Great Falls Resident Office**

1301 12th Ave.  
South Great Falls, MT 59403  
P.O. Box 2887  
Great Falls, MT 59403  
(406) 771-0333  
(406) 761-8246 Fax

### **Portland Resident Office**

1220 S.W. Third Ave., Room 1525  
Portland, OR 97204  
(503) 326-3371

### **Spokane Resident Office**

W. 1124 Riverside, Suite L300  
Spokane, WA 99201  
(509) 353-2964

### **Washington, D.C., Division**

400 Sixth St. S.W.  
Washington, DC 20024  
(202) 401-7834  
(202) 401-7061 Fax  
*Area Covered: District of Columbia,  
Maryland, Virginia, West Virginia*

### **Baltimore District Office**

200 St. Paul Place, Suite 2222  
Baltimore, MD 21202  
(410) 962-4800

### **Charleston Resident Office**

Union Square  
2 Monongalia  
Suite 202  
Charleston, WV 25302  
(304) 347-5209  
(304) 347-5212 Fax

### **Norfolk Resident Office**

Federal Building  
200 Granby Mall, Suite 320  
Norfolk, VA 23510  
(804) 441-3152

### **Richmond Resident Office**

8600 Staples Mill Road, Suite B  
Richmond, VA 23228  
(804) 771-2871  
(804) 771-8167 Fax

CONFIDENTIAL

MCKMDL00652179

MC-WV-00451.00307

CONFIDENTIAL

PROGRAM DU451500 VER 001  
DATE 03/30/93 TIME 17:27:05

MCKESSON CORPORATION  
DAILY CONTROLLED SUBSTANCE SUSPICIOUS ORDER WARNING REPORT  
SORTED BY DC, ROUTE, STOP, CUSTOMER, ICN, ITEM

8101 PAGE  
REPORT DU45R05A

ROUTE: 010 STOP: 041

GARDNER'S DRUG 10-41 CUST # 562470  
125 S MAIN ST  
ADA UH 45810  
PHONE: 419-634-7070 DEA # AT2958429

DC 101 - NORTH CANTON  
7500 FREEDOM AVE  
NORTH CANTON, OH 44720  
PHONE: 216-494-0350 DEA # PM0031942

DRUG ENFORCEMENT ADMINISTRATION

(ADDRESS)

(CITY, STATE)

(FAX NUMBER)

PURSUANT TO CFR21, S 1301.74(B), WE ARE SENDING A COPY OF THE DAILY CONTROLLED SUBSTANCE SUSPICIOUS ORDER WARNING REPORT FOR 03/30/93. THIS REPORT REFLECTS ORDERS FROM CUSTOMERS FOR SCHEDULES II-V CONTROLLED SUBSTANCES WHICH EXCEED THE ITEM MONTHLY AVERAGE FOR THE CLASS OF TRADE. A LISTING OF THE PARAMETERS USED ARE AVAILABLE UPON REQUEST.

WITH THE SUBMISSION OF THIS REPORT, WE ARE LEAVING TO THE DEA THE FINAL DETERMINATION OF WHETHER THEY ARE SUSPICIOUS OR UNUSUAL.

DIST. CTR. MGR./OR DESIGNEE

FEDP TRANS	CTL#	TRANS DATE	ITEM #	DC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION	UNIT	QTY	SC#
93033012737		03/30/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	1	111
93032900296		03/29/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	8	111
93031807861		03/18/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	1	111
93031709058		03/17/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	3	111
93031615772		03/16/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	1	111
93031500785		03/15/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	3	111
93031109196		03/11/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	3	111
93031000960		03/10/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	3	111
93030910582		03/09/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	2	111
93030812962		03/08/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	1	111
93030607397		03/06/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	1	111
93030207897		03/02/93	1623982	00131512964	CODINAL DH SYR	40Z PE/HYDROCODONE/PYRILAMINE	EA	5	111
ITEM MONTHLY AVG :					2.12000	FACTOR :	3.00	ITEM TOTAL :	32
								ITEM LIMIT :	6.36

Drug Operations Mar  
Exhibit 55-46  
1/15/97

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MCKMDL00652181

MC-WV-00451.00309

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PROGRAM DU45L650 VER 001  
DATE 03/18/93 TIME 08:31:09

MCKESSON CORPORATION  
MONTHLY CONTROLLED SUBSTANCE SUSPICIOUS PURCHASES REPORT  
SORTED BY DC, RETAIL ACCT MGR, GENERIC DESC  
PERIOD ENDING 02/93

0101 PAGE  
REPORT DU45R058

ROUTE: 031 STOP: 027

FINNEYS SOUTH 31-27 RAH # 024 CUST # 013300  
3031 CLEVELAND AVE S  
CANTON OH 44707  
PHONE: 216-484-3917 DEA # AF2936497

DC 101 - NORTH CANTON  
7500 FREEDOM AVE  
NORTH CANTON, OH 44720  
PHONE: 216-494-8350 DEA # PM0031942

DRUG ENFORCEMENT ADMINISTRATION

(ADDRESS)

(CITY, STATE)

(FAX NUMBER)

PURSUANT TO CFR21, § 1301.74(B), WE ARE SENDING A COPY OF THE MONTHLY CONTROLLED SUBSTANCE SUSPICIOUS PURCHASES REPORT FOR 02/93. THIS REPORT REFLECTS ORDERS FROM CUSTOMERS FOR SCHEDULES II-V CONTROLLED SUBSTANCES WHICH EXCEED THE ITEM MONTHLY AVERAGE FOR THE CLASS OF TRADE. A LISTING OF THE PARAMETERS USED ARE AVAILABLE UPON REQUEST.

WITH THE SUBMISSION OF THIS REPORT, WE ARE LEAVING TO THE DEA THE FINAL DETERMINATION OF WHETHER THEY ARE SUSPICIOUS OR UNUSUAL.

DIST. CTR. MGR./OR DESIGNEE

INVOICE #	INV. DATE	ITEM #	NDC NUMBER	SELLING DESCRIPTION	GENERIC DESCRIPTION	UNIT	QTY	SC	
00822	02/18/93	1343763	00045051360	TYLENOL+COD #3 TAB	100 CODEINE PHOSPHATE/APAP	EA	3	11	
00820	02/18/93	1343763	00045051360	TYLENOL+COD #3 TAB	100 CODEINE PHOSPHATE/APAP	EA	1	11	
00897	02/02/93	1343763	00045051360	TYLENOL+COD #3 TAB	100 CODEINE PHOSPHATE/APAP	EA	2	11	
ITEM MONTHLY AVG :							1.57142	FACTOR :	3.00
ITEM TOTAL :							6	ITEM LIMIT :	4.71

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MC-WV-00451.00311

## Drug Enforcement Administration

Drug Operations Manual  
Exhibit 55-48, Page 1 of 2  
1/15/97

Washington, D.C. 20537

JUL 18 1996

Ms. Diane Goyette  
Director of Regulatory Affairs  
National Wholesale Druggists Association  
P.O. Box 2219  
Reston, Virginia 22090-0219

Dear Ms. Goyette:

Thank you for your letter of April 29, 1996, voicing your organization's satisfaction with the April 17, 1996 semi-annual meeting with your membership. I know I speak for all Drug Enforcement Administration (DEA) personnel present at that meeting, in conveying their appreciation for the information presented and the cooperation received.

There are several issues that have been long-standing and we would like to bring you up to date with current activities. The proposed rule on freight forwarding has cleared DEA and is ready to be forwarded to the Department of Justice (DOJ) and the Office of Management and Budget (OMB) for their approval. The DEA ARCOS Unit has resolved the problem of "inadvertent under-reporting" that was attributed to differences in National Drug Code Numbers (NDC) pertaining to sizes. The ARCOS Unit has been able to take care of this problem internally without any further involvement of ARCOS participants.

The last issue centers around delivery of Schedule II order forms by drivers and the associated distribution scenarios. DEA has carefully reviewed the scenarios discussed at the April 17, 1996, meeting and has approved the following circumstances in which driver handling of Schedule II Order Forms (DEA Form 222) will be permitted, and the circumstances under which we will allow DEA Forms 222 to be transmitted by facsimile. DEA will permit the driver to handle DEA Forms 222 provided they are carried in a sealed envelope. DEA will permit the "faxing" of DEA Forms 222 by the customer to the DEA registered distribution center, in order to facilitate the expedient filling of the DEA Form 222. The distributor may prepare the order

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MC-WV-00451.00312

Ms. Diane Goyette

from the facsimile and then compare the prepared order with the controlled substances, when the original DEA Form 222s arrive with the driver. Under no circumstances will DEA permit the driver to have the sole responsibility for reconciliation of the pre-prepared order with the actual DEA Form 222. DEA also does not approve of the scenario that allows the driver to "fax" the copy of the order form at the cross-docking facility. The cross-docking facility should only be used for the temporary storage of controlled substances in transit and DEA will not recognize any other activity, such as "faxing", at the facility. Further, the driver should have no knowledge as to the contents of the DEA Form 222. Also, it is the opinion of DEA that allowing the drivers to be responsible for sole reconciliation of Schedule II orders does not provide the "special handling" of Schedule II orders that the Controlled Substances Act mandates and the diversion possibilities presented by this scenario are obviously more plentiful.

Please convey this decision to your membership. We will inform all of our field offices of this approved procedure, in the hope that it will prevent admonishments such as the one that one of your members was given for allowing the driver to transport the DEA Forms 222. As always, it was a pleasure meeting with you and your membership. If you have any questions, please contact the Liaison and Policy Section at (202) 307-7297.

Sincerely,



G. Thomas Gitchel, Chief  
Liaison and Policy Section  
Office of Diversion Control

U.S. Department of Justice  
Drug Enforcement Administration

Washington, D.C. 20537

AUG 28 1996

Ms. Diane Goyette  
Director of Regulatory Affairs  
P.O. Box 2219  
Reston, Virginia 22090-0219

Dear Ms. Goyette:

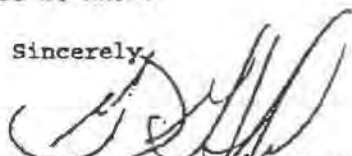
Reference is made to our recent meeting regarding the facsimile transmission of DEA forms 222 from retail pharmacies to distributors. As I advised you at that time, the Drug Enforcement Administration (DEA) will permit the facsimile transmission of an executed DEA form 222 directly from a retail pharmacy to a distributor to facilitate filling of an order, provided that the facsimile copy is compared with the original copy prior to shipping the order. It is acceptable, although in our view, not desirable, to permit a proprietary driver, acting as an agent/employee of the distributor, to "fax" a DEA form 222 on behalf of the pharmacy, to the distribution center. The practice of allowing common or contract carriers to "fax" DEA forms 222 to distribution centers, however, is not in the public interest and does not effectively guard against diversion.

We realize that distribution centers adopted procedures for facsimile transmission of DEA forms 222 to expedite delivery of controlled substances to their customers. Nevertheless, we are very concerned that a practice that enables common or contract truck drivers, who are subject to only limited security checks and controls, to know exactly what a particular shipment of drugs will contain, poses a significant threat of diversion.

We urge your members, therefore, to cease this practice as soon as possible. It has been represented that the practice of "faxing" DEA forms 222 by common and contract carriers is widespread and well-established in many of your members' distribution centers. Therefore DEA will recognize a transition period until December 31, 1996 to discontinue this practice.

If you have any questions, please let me know.

Sincerely,

  
G. Thomas Gitcher, Chief  
Liaison and Policy Section  
Office of Diversion Control

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MC-WV-00451.00315



U.S. Department of Justice  
Drug Enforcement Administration

Washington, D.C. 20537

OCT 28 1996

Ms. Diane P. Goyette  
Director of Regulatory Affairs  
National Wholesale Druggists' Association  
P.O. Box 2219  
Reston, Virginia 20195-0219

Dear Ms. Goyette:

Reference is made to previous correspondence regarding the facsimile transmittal of DEA forms 222 and, in particular, your letter dated October 15, 1996 regarding this same subject.

It is the Drug Enforcement Administration's (DEA) policy that if a firm has filled an order pursuant to the receipt of a facsimile copy of DEA form 222, the firm's proprietary driver (i.e. a driver employed by and under the direct supervision of the registrant filling the order) may pick up the original DEA form 222 at the purchaser's place of business at the time that the controlled substances are delivered. Although the proprietary driver will be comparing the original DEA form 222 with the facsimile copy, the ultimate responsibility for ensuring that this reconciliation takes place will continue to rest with the shipper.

Although DEA continues to have concerns about permitting even proprietary drivers to perform this function, we will permit this practice as it is presumed that a firm utilizing proprietary drivers ensures that background security checks have been conducted and maintains a higher level of control than that afforded to contract or common carrier drivers.

We would appreciate your assistance in conveying this information to your members, along with the reminder that under no circumstances should a contract or common carrier driver have sole responsibility for the reconciliation of the original order form with the facsimile copy.

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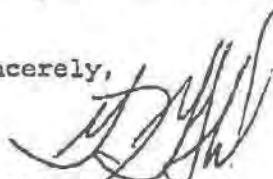
Ms. Diane P. Goyette

Page Two

We have provided all DEA Diversion Investigators in the field and at Headquarters with an explanation of this policy and hope that we have now eliminated any confusion on this matter that your members or our personnel may have experienced.

If you have any further questions or need additional guidance, please let me know.

Sincerely,



G. Thomas Gitchel, Chief  
Liaison and Policy Section  
Office of Diversion Control

**MONTHLY ARCOS BALANCING**  
**(Due by the 15th of each month)**

TO:

DC Name: \_\_\_\_\_

Month/Year: \_\_\_\_\_

✓ one:

☐ ARCOS is in balance.

☐ ARCOS is out of balance, and the reason is:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date

DCM/OM Signature

**SEND THIS REPORT TO VPDO AND DDQ**

(01/

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MCKMDL00652191

MC-WV-00451.00319

To: All DCM's  
Date: January 2, 1996

From: Dan White  
Location/Tel: 28/8598

**McKesson**  
Intra Company  
Correspondence

Subject:  
DEA Year End  
Form 222 Waiver

Copies To:  
Bean, S. - 36  
Blythe, R. - Columbia  
Funk, R. - 28  
Hayes, M. - ERO  
Lannon, T. - Denver  
Murphy, J. - 28  
Peck, B. - ERO  
Roos, T. - ERO  
Russell, B. - Memphis (149)  
Thompson, D. - 36  
Walker, D. - WRO  
Watts, C. - WRO

The attached letter from Thomas Gitchel, Chief Liaison and Policy Section Office of Diversion Control, authorizes Drug Wholesalers to accept Drug Enforcement Administration forms (DEA Form 222) during the month of January 1996, which are incorrectly dated January 1995. Be sure to follow the instructions outlined in the document.

Please note: The statement "until Further notice" means that this policy will be valid from now on during the month of January only, each year. File a copy of this in your ARCOS general file and also post a copy in your vault.



Dan White  
a:\dwd\deawaivr.sam

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MC-WV-00451.00320



Drug Operations Manual  
Exhibit 55-50, Page 2 of 2  
1/15/97  
U.S. Department of Justice  
Drug Enforcement Administration

Washington, D.C. 20537

DEC 21 1995

Ms. Diane P. Goyette  
Director of Regulatory Affairs  
National Wholesale Druggists' Association  
P.O. Box 2219  
Reston, Virginia 22090-0219

Dear Ms. Goyette:

At this time of year, the Drug Enforcement Administration (DEA) frequently gets requests for authorization to accept DEA order forms (DEA form 222) during the month of January on which the date ordered reflects the previous year instead of the new year.

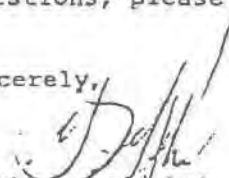
It is DEA's long-standing policy that firms may accept order forms during the month of January that show the previous year's date instead of the correct one, provided that the following procedures are followed.

1. When an order form is received and this type of error is discovered, the receiving firm will call the customer and verify that they intended to indicate the correct date.
2. This contact with the customer will be documented and attached to the order form.
3. The date on the order form will be changed to reflect the current date.
4. After January 31, any order form received with the previous year's date will be rejected and returned to the customer.

This policy will remain in effect until further notice. We would be grateful if you would advise your members that it is no longer necessary to receive this authorization annually.

Thank you for your assistance in conveying this information to your membership. If you have any questions, please call Ms. Ann L. Carter at (202) 307-3618.

Sincerely,

  
G. Thomas Citchel, Chief  
Liaison and Policy Section  
Office of Diversion Control

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MCKMDL00652193

MC-WV-00451.00321

**EXPIRED CUSTOMER DEA CERTIFICATE**  
**"RENEWAL IN PROCESS"**  
**VERIFICATION SHEET**

Drug Operations Manu  
Exhibit 55-51  
1/15/97

☐ Account Name: \_\_\_\_\_ Account # \_\_\_\_\_

☐ Address \_\_\_\_\_

☐ City/State/ZIP \_\_\_\_\_

☐ DEA # \_\_\_\_\_

Written-up by \_\_\_\_\_ Date \_\_\_\_\_

Comments:

---

Name of DEA Contact \_\_\_\_\_ DEA Field Office \_\_\_\_\_

Date verified \_\_\_\_\_ Time \_\_\_\_\_ hours

☐ Schedules: 2 2N 3 3N 4 5 ALL

(Circle all applicable)

Expires \_\_\_\_\_

Confirmed by \_\_\_\_\_

Comments:

{01/5

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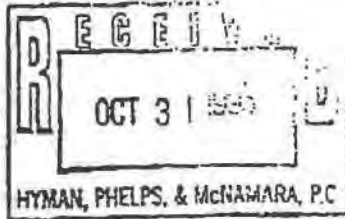
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MC-WV-00451.00323

## Drug Enforcement Administration

Drug Operations M  
Exhibit 55-52, Page  
1/15/97

Washington, D.C. 20537

OCT 27 1995

John A. Gilbert, Jr., Esq.  
Hyman, Phelps & McNamara, P.C.  
700 Thirteenth Street, N.W., Suite 1200  
Washington, D.C. 20005

Dear Mr. Gilbert:

This is in response to your letter of October 12, 1995, concerning the Drug Enforcement Administration's (DEA) policy for generic or brand substitution of Schedule II controlled substances on DEA order forms.

Specifically, you are requesting clarification of whether DEA's existing policy (a generic product may be substituted for a name brand product on an order form provided that the customer agrees to accept the product and the name and National Drug Code Number of the product shipped are reflected on the form) applies to circumstances where distributors enter into automatic substitution agreements with their customers. It is our understanding from your letter that a distributor and customer would enter into a written agreement that establishes the circumstances under which the distributor may substitute a generic for a brand name, a generic from another manufacturer, or a brand name for a generic, if the distributor cannot fill the order as submitted by the customer.

Based on the information you have provided, the substitution of drugs as described above would be consistent with DEA's policy regarding substitutions, to the extent that it would also be allowed under other Federal, state or local law. As stated in Mr. Haislip's 1992 letter to the National Wholesale Druggists Association and others, generic substitution of identical

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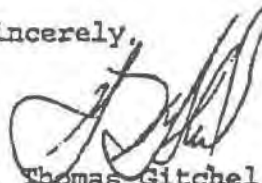
John A. Gilbert, Jr., Esq.

Drug Operations Manual  
Exhibit 55-52, Page 2 of 2  
1/15/97

products is acceptable provided the name and NDC number of the product is entered on the order form and the customer agrees to accept the substitution. The policy does not specify that the customer agreement must be for each specific substitution; a customer may agree in advance to substitutions, so long as the agreement is in writing.

We trust that the above addresses your concerns. If you have any further questions, please do not hesitate to contact this office at (202) 307-7297.

Sincerely,



G. Thomas Gitchel, Chief  
Liaison and Policy Section  
Office of Diversion Control

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MCKMDL00652197

MC-WV-00451.00325